

HR5 AEG Code of Conduct



Responsible	All staff and AEG representatives
Accountable 1	Chief People Officer
Consulted	Legal Team, People and Culture Governance Manager
Informed	All staff, students, volunteers, families

Links to ECSNR 2011 and WA 2012:

R168 2i(i)

Links to NQS:

QA 2 QA 3 QA 4 QA 5
QA 6 QA 7

Related Processes:

6.2.12 Manage Code of Conduct

Policy Statement

The objective of this policy is to articulate Affinity Education Group's compliance with National Law and Regulations as listed above from the Education and Care Services National Regulations 2011, including amendments, and the Education and Care Services National Regulations WA 2012 as well as child protection and workplace relations legislation.

Affinity Education Group (referred to as the Company or Affinity) employees are tasked with the huge responsibility of maintaining the safety and well-being of all children in addition to complying with legislation, organisational procedures and displaying appropriate professional and personal behaviours.

Affinity is committed to the provision of the highest possible standards of early childhood education and care and to maintain a positive reputation in all work-related activities and business dealings.

A documented Code of Conduct (Code) assists to establish a consistent standard of expected behaviour of employees in the workplace with regard to their own legal and ethical behaviour and interactions and relationships they engage in with colleagues, children and families and other visitors in the centre.

This Code sets out the actions, behaviours and conduct required of employees, contractors, officers, students, volunteers and any other person performing duties for, or on behalf of, or otherwise representing, the Company in any way (referred to as **Company Representatives**), at centre and non-centre levels. This Code applies whenever there is a connection with the Company Representative's employment or engagement with Affinity. This Code applies to Company Representatives' dealings with all persons including, but not limited to, children, parents and families, fellow Company Representatives, regulatory bodies, government departments and suppliers.

All Company Representatives must comply with this Code of Conduct.

The Company's reputation and standing in the community is largely determined by public perception of the Company Representatives. Accordingly, Company Representatives are expected to maintain the highest standards of integrity, discretion and ethical conduct when performing their duties or representing the Company in any way.

Company Representatives will be informed about this Code of Conduct and how it relates to the performance of their duties during induction and orientation and, where appropriate, integrated through various Company staff training and development programs, leadership development programs and other forms of professional development. Company Representatives are responsible for maintaining familiarity with the Code of Conduct throughout the performance of their duties for or on behalf of the Company. Company Representatives' actions, behaviours and conduct may be assessed against the requirements of this Code of Conduct during performance appraisal and review, and disciplinary processes.

Where it is established that any Company Representative, regardless of seniority, has breached this Code of Conduct, they may be subject to disciplinary action up to and including termination of employment or engagement.

The Affinity Way All Company Representatives must promote and work in line with the Affinity Way.

Our Brand Promise

To realise the potential in everyone.

Our Mission

To inspire and nurture individuals to reach their full potential.

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Our Bold Goal

To significantly build the capability and competence of 100,000 children and 5,000 Affinity team members over the next 5 years.

Our Safety Commitment

At Affinity Education, we believe that child safety is everyone's responsibility. We are committed to upholding the safety, rights and wellbeing of all children and promote a culture of child safety with a zero-tolerance approach to child abuse and harm. We have a commitment to child-safe recruitment and ongoing child-safe employment and the safety and wellbeing of every child in our care is Affinity's paramount priority.

Our Values

At Affinity, our values are in place to guide our daily behaviours, be the foundation for decisions we make and guide the way we interact and deliver services to each other and the families and children we serve. Managers play an integral role in living the values on a daily basis to set the tone for all employees.

Being completely connected – We bring out the best in each other and the families and communities we serve through collaboration and cooperation, communicating openly and sharing knowledge and information.

How do we live this value?

- We are transparent in both our actions and communication
- We build effective internal and external networks with individuals, teams, families and external providers
- The relationships we develop and maintain are built on honesty and trust
- We proactively seek and share relevant information focusing on the best outcome for Affinity, its employees and the families and children we serve.

Having serious fun – We all participate in making Affinity a fun place where we share a laugh, celebrate achievements, and maintain perspective and balance for each other.

How do we live this value?

- We all contribute to building a workplace culture that is positive, rewarding and enjoyable
- We speak positively of others and recognize good performance with constructive feedback
- We acknowledge efforts and celebrate achievements by giving credit where credit is due
- We smile, laugh and demonstrate genuine enjoyment in and with others and our environments

Creating shining stars – We support and enable each other to grow, learn and develop by giving everyone the autonomy they need and having their back.

How do we live this value?

- We actively seek and accept feedback from others to enhance our performance
- We provide constructive feedback to others to encourage their growth and development
- We admit our mistakes and recognise for ourselves and others, that mistakes provide an opportunity to learn
- We embrace opportunities for improvement and take personal ownership

Going above and beyond – We act with genuine positivity, pride and energy and go out of our way to deliver value that goes above and beyond the ordinary.

How do we live this value?

- We set high standards of performance and quality for ourselves and others
- We consistently strive to meet or exceed these standards
- We fulfill commitments, delivering on promises in the time committed
- Each day we challenge ourselves to build and improve on the services we provide to others

Living the team spirit – We all contribute to the Affinity culture of winning attitudes, teamwork, cooperation and sense of belonging for everyone.

How do we live this value?

- We collaborate with our colleagues to ensure the best outcomes for Affinity, its employees and the families and children it serves
- We are inclusive and accepting of others, including them in decisions that affect them and in the services we provide
- We support each other and lend a hand, when or if necessary
- We say what we mean and we mean what we say to ensure transparency and honesty with our teams



Delivering outstanding professionalism – We take our work seriously by being professional and respecting each other for who we are, our individuality, knowledge, skills and experience.

How do we live this value?

- We are accountable and take personal responsibility for our decisions, actions and mistakes
- We are inclusive and respect diversity of people, ideas and opinions
- We learn from others, and our own experiences to grow professionally each day
- We continually strive to improve our knowledge, skills and abilities so that we can provide outstanding service to each other and the children and families we serve.

Company Representatives have the right to:

- A psychologically and physically safe workplace where the environment is set up and supported to ensure the safety of all.
- Be treated fairly, respectfully and equitably by management, colleagues, children and families
- Be supported in understanding legislative requirements in relation to the Education and Care Services National Law Act 2010, Education and Care Services National Regulations (2011 and WA 2012) and the National Quality Standards, as well as WHS, child protection and workplace relations legislation.
- Be provided with policies and procedures to ensure they understand their practices and responsibilities, their duty of care and ensuring that continuity and quality practices are observed throughout the workplace.
- Receive a job description upon employment that will outline the duties that are expected of them.
- Have access to resources and information within the workplace and from external organisations.
- Receive an induction process when commencing employment to familiarise themselves with the workplace.
- Be provided with opportunities to provide input, feedback and suggestions for all aspects of the workplace.
- Be accepted and appreciated for their individuality including diversity in age, gender, culture, religion, language, socio-economic, ability, lifestyle or LGBTI status.
- Be informed of any changes that will affect the workplace.
- Have any grievances dealt with in a professional, fair and timely manner.
- Privacy, with any personal information, either written or spoken, kept in the strictest confidence.
- All centre staff are employed under the relevant Modern Award.

General expectations of all Company Representatives

All Company Representatives are expected to exercise good judgement to determine the appropriate action, behaviour or conduct in any given situation. The Company expects all Company Representatives to:

- Be honest and act with integrity in all aspects of their employment or engagement including with regard to undertaking assigned duties and work attendance.
- Comply with all applicable legislation and regulations, and Company policies, procedures, guidelines and directions, including without limitation in respect of work health and safety and child protection.
- Provide written notice to Affinity if they receive a negative notice or if there is a change to the educator's accreditation or registration as a teacher AND provide this notice within 72 hours of the event or within 24 hours of becoming aware.
- Not engage in any form of unlawful, offensive or anti-social conduct or any other conduct that could bring Affinity into disrepute.
- Respect the rights of other persons by:
 - Treating other persons fairly, courteously and without discrimination or harassment.
 - Upholding the rights of children and their parents or caregivers.
 - Being respectful of, and responsive to, persons of all ethnicities, cultures and beliefs.
 - Promoting the principles of equal opportunity in the Company's workplaces.
- Fulfil their responsibilities as per their position description and other tasks as reasonably requested by their manager and to perform their duties to the best of their abilities by:
 - Showing commitment to produce a high quality of work.
 - Demonstrating punctuality. Being on the job ready and on time is very important. It is expected that arrival allows for ample time to organise yourself and be ready to commence work responsibilities at the expected time. Managers must be informed as soon as practicable, where employees will be late to commence their work. Regular lateness will be addressed using performance management processes.
 - Complying with the requirements of any professional bodies that they are registered or affiliated with, where this impacts upon the Company.
 - Making decisions appropriate to the position held and being responsible for those decisions and the actions that result from them.



- Being supportive of changes made by the Company, as change is necessary to the Company's ongoing business success and the provision of high standards of childcare and education.
- Being supportive of work colleagues and accepting job responsibilities as a team member, including following the lawful and reasonable instructions and directions of Team Leaders, Centre Managers and Managers.
- Upholding the reputation and standing of the Company by being responsible for the security and confidentiality of all information that is gained during the course of employment or engagement with the Company.
- Using financial and non-financial information gathered by the Company and personal knowledge of the Company's systems and processes only to perform the Company's business.
- Treating all Company property and resources with care and respect.
- Complying with all applicable legislation, rules and regulations at all times.

General expectations of Managers

The Company expects people in managerial roles to:

- Set an example to other staff in their own observance of this Code of Conduct.
- Ensure that staff have access to copies of this Code of Conduct and other relevant documents and policies.
- Ensure that the requirements of this Code of Conduct are reflected in the day to day management and leadership of staff.
- Ensure staff at all times maintain high standards of conduct in the workplace.
- Address inappropriate conduct and ensure that staff who disclose concerns regarding inappropriate conduct are supported.
- Represent the Company positively and professionally when interacting with other Company Representative and external stakeholders.
- Take ultimate responsibility for the quality of care given and the work performed, and the actions and the decisions of Company Representatives under their supervision.

General expectations of Centre Managers

The Company expects all Company Representatives who are Centre Managers to:

- Ensure Centre staff are treated fairly and with respect.
- Support Centre staff in learning about the Company's expectations of them.
- Ensure Centre staff are provided with copies of policies and procedures to ensure they understand their duties and their duty of care, and continuity and quality practices are observed throughout the Centre.
- Ensure the Centre is an environment that is safe from harm.
- Clearly answer any questions from Centre staff about the duties and responsibilities that are expected of them.
- Ensure Centre staff undertake induction on commencement of employment or engagement.
- Be open to receiving feedback and suggestions for the running and daily program of the Centre.
- Ensure Centre staff are accepted and appreciated for their individual differences (cultural, religious, language and socioeconomic).
- Explain changes that will affect the Centre to Centre staff.
- Address any grievances raised at the Centre in a professional manner and in accordance with Company, policies, procedures and guidelines.
- Ensure personal information about Centre staff is held in the strictest confidence.
- Ensure this Code of Conduct is followed and demonstrated by self and all staff at the centre.

General expectations of Centre Staff, including Centre Managers

- Follow legislative and organisational requirements. Uphold all legal, ethical and organisational obligations in regard to maintaining children's safety and protection including a comprehensive knowledge of and compliance with organisational policies and procedures in regard to:
 - *Child Safety and Protection*
 - *Safe Environment*
 - *National Principles of Child Safe Organisations*
 - *Supervision*
 - *Interactions with Children*
 - *Health and Safety*
 - *Supporting Behaviours*
 - *Equity and Inclusion*
- Act in the children's, families', colleagues and centre's best interests and advocate for their rights
- Maintain a safe, healthy and hygienic environment and one in which everyone can feel supported.
- Attend professional development to ensure maintenance of skills and knowledge and the currency in the service.
- Engage in service events and functions which may fall outside of regular hours of operation.



- Ensure confidentiality is maintained with all information gathered during and after employment at the centre and only share necessary information within scope of responsibility.
- Be involved in performance appraisals to ensure reflection and continuing improvement of skills.
- Be reliable, consistent and take initiative wherever possible whilst maintaining flexibility and adapt to change.
- Ensure sensitivity to other's needs and use active listening techniques.
- Actively participate and be committed to the quality improvement process.
- Be involved in the constant revision of service policies and procedures.
- Understand their duty of care and always act in a way that promotes this.
- Always act ethically within the guidelines of Early Childhood Australia's Code of Ethics, Education and Care Services National Regulations (2011 and WA 2012) and Education and Care Services National Law Act 2010, including amendments and other work place legislation.
- Be required to deal with the Centre Manager directly if they become aware of any negligence or breaches of service policies and procedures.
- Ensure all facilities and resources be used in an appropriate manner.
- Ensure warm and accepting yet professionally appropriate language, gestures and body language is used at all times with all centre users – management, children, families and colleagues. Swearing, labeling, discriminatory, sexist or sexual and offensive statements and actions will not be tolerated. This also includes behaviour that may be humiliating, belittling or excluding.
- Actively develop trusting relationships with families, ensuring the relationship is maintained and remains professional and does not cross professional boundaries, including sharing of information within scope of responsibility.
- Address challenging behaviour in a collaborative, respectful and supportive way according to organisational guidelines.
- Have patience and empathy when dealing with families, children, colleagues and management.
- Be open-minded with new ideas from management, colleagues, children or parents.
- Conduct themselves in a professional, respectful manner in accordance with the culture of the centre and the Affinity Way.
- Register time and attendance data accurately according to rostered shifts, and where outside of rostered shifts, valid reasons are provided or prior approval is sought.
- Educators will abide by Child Safe Standards and work in ways that protects child safety and maintains children's rights and dignity at all times. Disciplinary processes will be enacted when educators do not protect the safety of children as a priority, engage in practice that contradicts child safety and do not follow child safe standards.

Family Values

As an approved provider Affinity Education delivers educational programs under the Early Years Learning Framework through the Lifelong Learning Curriculum. While the scope of the EYLF is broad there are a number of concepts and topics that are of a personal and sensitive nature. We are respectful of families' beliefs and values for each.

We are committed to working with our families as trusted partners and as such pay full respect to the boundaries that do exist between the responsibilities and prevue of families and those of our professional responsibilities to deliver education and care.

These topics and concepts are those that we know are shaped by individual families' values, traditions, religion and experiences. As professionals we respect families to lead the conversations with their children on topics such as sex, sexual identity, politics and religion. The expectation of our educators is that they respect this organisational and family view.

Business Standards and Quality

Looking after quality

Affinity provide education and care services and support to the children and families enrolled in the centres. Whilst the Company's primary focus is on providing quality early childhood education and care services through its network of Centres, Company Representatives who do not work in a Centre also play an important role. In order to achieve strategic objectives and work towards Affinity bold goal, non-centre Company Representatives provide the support functions required to maintain quality at the centre level.

Looking after children

The Company recognises the importance of fostering positive interactions between Centre staff, the children and their families. Company Representatives are to interact and communicate with children and families in a professional and ethical manner befitting the highest possible standards of care at all times. Company Representatives who have contact with children at our



Centres will engage and guide children with positive and meaningful interactions and will show respect for each child and family as individuals.

All Company Representatives who have contact with the children must ensure that they:

- Follow all child related Affinity policies and procedure including practices as outlined in Interactions with Children Procedure and Supporting Behaviours Procedure in terms of appropriate interactions and inappropriate discipline.
- interact with children frequently and respectfully and with regard to individual needs and preferences;
- support equity and diversity and acknowledge and respect all children's cultures, customs, lifestyles and abilities;
- encourage and nurture all children's learning and development;
- use positive guidance and supportive behaviour strategies in accordance with the Supporting Behaviours Procedure;
- provide a safe and nurturing, yet stimulating and challenging environment for all children;
- are physically and emotionally available to children and respond to children in a friendly and courteous manner;
- role-model appropriate behaviours to children;
- allow children to have a voice and to contribute to making decisions that affect them;
- foster positive self-concept, self-esteem and harmony;
- only photograph or record children with prior parental consent;
- actively listen and interact with children at their level and understand issues and concerns from their perspective; and
- at all times, respect children and handle children in an appropriate manner.

Company Representatives must never:

- handle children roughly, pull, grab or drag them or swing them by the arms - not even through play;
- discipline children using physical force, name calling or isolation techniques;
- deprive children of attention or food or play;
- force children to act in a certain way or perform at their request;
- touch or speak to a child in an inappropriate way including sexually, physically or aggressively; and
- engage in ANY behaviour that is likely to cause harm, either physically or emotionally, to a child.
- Company representatives must understand and not engage in inappropriate discipline. [Inappropriate Discipline - ACECQA](#)

Communication – All Mediums

The Company recognises the importance of effective communication to ensure it achieves its goals. Given the size of the Company, and the distances between many Company locations, it is important that communications are received, and shared, in a timely and effective manner.

All Company Representatives must, when communicating, uphold the Company's values and policies relevant to how, and what, they are communicating, and maintain confidentiality, privacy and professionalism at all times.

Language

To ensure the delivery of outstanding professionalism, Company Representatives must not, at any time in the performance of or related to their work or in the presence of any children, parents or families, fellow Company Representatives, regulatory bodies, government departments or suppliers, use inappropriate language or words of a derogatory nature.

Internet, Media and Social Networking

Company Representatives must comply with Affinity's Social Media Policy and External Communications Procedure.

Professionalism

All Company Representatives must act professionally and with integrity at all times. Company Representatives must perform their duties to the best of their ability with care, competence and efficiency and are to avoid situations where their actions, behaviours or conduct could reflect poorly on the Company or impact negatively on them.

Professionalism includes:

- Maintaining appropriate personal grooming and presentation (clean and well-fitting uniform, tidy hair, neat fingernails, no chewing gum, closed in and non-slip shoes, in accordance with health and safety requirements and dress code procedures);
- Upholding the reputation of the Company at every opportunity;
- Striving to ensure a high standard of work in all aspects of work;
- Respecting all other persons in all duties;
- Valuing and respecting equality and diversity, across all areas of the Company's operations;



- Using appropriate channels to address and resolve any problems or issues of concern;
- Complying with all applicable Company policies, procedures and processes.

Conflict of Interest and Misconduct

Company Representatives must disclose in writing to their manager, or the board, the existence of any potential or actual conflicts of interest that may impact on the roles and responsibilities of the position. Where a reasonable risk of conflict of interest is determined to exist, Company Representatives will comply with instructions to resolve the conflict.

Examples of conflicts of interest, or circumstances, which will lead to a conflict of interest arising include:

- Doing business with, or being employed by, an organisation that is in the same or similar business as Affinity Education; or a competitor of Affinity Education; or
- Undertaking secondary employment for families who attend an Affinity Education centre in the form of babysitting* or child care or;
- Doing business with a supplier because they have given the Company or one of its Company Representatives a gift or benefit;
- Working alongside, or in a manager/employer relationship with a close relative (for example; spouse or partner, parent, child, sibling, uncle, aunt, niece, nephew, grandparent or in-law); or
- Working in the immediate area/room as a child attending the centre who is a close relative (for example, child, step child, foster-child, niece, nephew, grandchild); or
- Being involved in decisions relating to the selection, appointment or promotion of a close relative or associate; or
- Providing or allowing favours or showing bias or other benefit towards friends, family or acquaintances.

***Babysitting**

Affinity does not endorse its Company Representatives from engaging in babysitting of children, provision of services or other engagement with families enrolled at an Affinity centre. The centre and Affinity will not accept liability arising out of such an engagement or service.

Gifts, benefits and hospitality

All gifts, benefits and hospitality given to, or provided for the benefit of, Company Representatives from children, parents and families, fellow Company Representatives or suppliers valued over \$100 must be declared to the Company. Each Company Representative who has received or benefitted from such a gift, benefit or hospitality must declare it using the [Corporate Gift Receiving Declaration form](#).

In addition:

- Gifts, benefits and hospitality valued at more than \$200 but less than \$350 may only be accepted by a Company Representative after verbal approval by the Company Representative's immediate manager/supervisor.
- Gifts, benefits and hospitality valued at more than \$350 but less than \$500 may only be accepted by a Company Representative if there is significant relationship or commercial value for the Company in doing so, as approved verbally by the Company Representative's relevant general manager or head of department (the CEO for the CEO's direct reports).
- Gifts, benefits and hospitality valued at more than \$500 (e.g., sponsored travel or attendance at industry/corporate events) may only be accepted by a Company Representative if there is significant relationship or commercial value for the Company in doing so, as approved in writing by the CEO.

Working Relations

The Company is committed to promoting positive working relations between all Company Representatives, including between those Company Representatives who have management and leadership responsibilities and their subordinates.

Concerns regarding Compliance with this Code of Conduct

Company Representatives must raise any concerns they may have about compliance by other Company Representatives with their Centre Manager or their Manager or Affinity Education Group's Senior Human Resources Business Partner, if required, who will respond to the concern in accordance with Company policies and procedures, which may include escalating the concern for further consideration.

Whistle Blower Policy

The Company's Whistle Blower Policy provides a reporting framework for Company Representatives to report suspected unlawful or unacceptable behaviour, including serious breaches of this Code of Conduct. Those Company Representatives who have made



a report in accordance with the Company's Whistle Blower Policy will be protected from retaliation and victimisation in accordance with the Policy.

Procedure for breaches of the code of conduct

- Any breach will be managed in a fair, unbiased and supportive manner.
- The Centre Manager/ State Manager as appropriate will manage all breaches professionally.
- If necessary, relevant authorities may be contacted in regards to a breach.
- All people involved in the breach will be kept up to date with the process.
- The person nominated to manage the breach will work out a relevant plan to help resolve any matters.
- All parties will be given the opportunity to give their version of events.
- All matters discussed in relation to a breach will be kept confidential.
- An appropriate outcome/strategy will be decided on. The entire process will be documented with confidentiality in mind.
- If a Parent/Guardian breaches service policy on many occasions they may be asked to leave the service as another service may better suit their needs.
- Company procedures in relation to grievance and conflict resolution, corrective action and discipline and handling allegations will be followed.

Company Property and Confidentiality

Copyright and Intellectual Property

All Company-related documents, materials and tools (including its policies, procedures and learning and educational programs) belong to the Company and may not be copied or reproduced, in any way, by a Company Representative for use outside of the Company, without the written consent of their general manager.

Privacy and Confidentiality

During the course of their duties, Company Representatives may have access to private and confidential documents and information of (for example):

- the Company;
- the children in the Company's care and their families;
- government agencies;
- the Company's suppliers; and
- other persons who, and organisations which, Company Representatives interact with.

Company Representatives must not discuss nor disclose private or confidential information with other Company Representatives or any other person, unless such discussion or disclosure is required to perform their duties or to comply with a legal requirement, whether during or after their employment or engagement by the Company.

Company Representatives must inform their immediate supervisor if they become aware of or suspect any other Company Representative of discussing or disclosing private and confidential information other than in the course of their duties or to comply with a legal requirement.

All Company Representatives must store private and confidential documents and information securely, including records relating to Company Representatives, children and families and Centre finances, locked securely on Company premises.

If any Company Representative is unsure whether to discuss or disclose private or confidential documents or information in any particular circumstance, the Company Representative must immediately seek advice and direction from their Centre Manager or Manager.

Photography of Children

Parents or guardians will complete a Photographic and Media Consent form for their children in the Company's care. Company Representatives must adhere to the instructions provided in each form in respect of any photographic or video images of children. Company Representatives will not photograph or video children on personal devices and will not have personal devices on their person when working with children. Any image or recording of children will only be shared on approved platforms.



Use of the Company's Property and Resources

The Company makes available property and resources, including, without limitation, cash, equipment, motor vehicles, Company information, telephones, internet and intranet systems, computer hardware, technology systems and associated software to enable Company Representatives to carry out their duties and responsibilities, Company business activities to be undertaken, and Company business goals to be achieved.

The Company may approve limited personal/ non-business use of these items at its sole discretion from time to time. Company Representatives must obtain permission from their Centre Manager or Manager before:

- using any Company property or resource for personal/ non-business use; or
- removing any Company property or resource from Company premises.

Company Representatives must ensure the Company's logo, letterhead and stationery are used only for Company business.

Accessing Company Premises Outside of Operation Hours

Affinity employees must seek approval from their manager during operational hours in order to access centre-based and Centre Support Office premises outside of operational or business hours. Approval may be granted if:

- the reason for accessing the service is valid
- the employee agrees to only undertake tasks as per the reason given
- the employee only agrees to enter the premises, and not family, friends or children
- the employee agrees to secure the premises on leaving the premises

Access to the premises (centre or CSO) would typically be restricted to those who have keys or a swipe card.

Telephones and Mobiles

Company owned or leased telephones are to be used for Company business only. When receiving or making calls, Company Representatives must speak in a professional manner and uphold the Company's values. Centre staff must obtain prior permission from their Centre Manager if they wish to make a personal call whilst on duty.

For all centre staff, mobile phones, smart watches or any other personal communication or IT devices are strictly prohibited when working directly with children. These devices are not to be used or kept on the person at any time when supervising and counted in ratio. The Company takes a zero-tolerance approach. They may be used during work breaks in the staff room. With prior consent from the manager, they will be permitted for genuine medical reasons.

Smoking

Affinity workplaces are smoke free and Company Representatives must not smoke or use electronic cigarettes on work premises or in uniform. Company Representatives must not, without written approval from Human Resources, take smoking breaks in addition to any lunch breaks or rest pauses to which they are entitled.

Company Representative Consent:

I _____ have read and understand the AEG Code of Conduct. I am aware that there are procedures to follow and, if there is a breach in the code, I am aware that this may result in disciplinary action, up to and including, termination of my employment or engagement with the Company.

Signature: _____

Date: _____

Relevant Early Childhood Legislation

- Education and Care Services National Regulations 2011
- Education and Care Services National Regulations WA 2012
- National Quality Framework for Early Childhood Education and Care
- United Nations Convention on the Rights of the Child
- Early Childhood Australia: Code of Ethics
- Children and Young People Act 2008 (ACT)
- Children and Young Persons (Care and Protection) Act 1998 (NSW)
- Care and Protection of Children Act 2007 (NT)
- Child Protection Act 1999 (Qld)
- Children, Youth and Families Act 2005 (Vic.)

- Children and Community Services Act 2004 (WA)
- Crimes Amendment (Protection of Children) Act 2014 (Vic.)
- Victorian Child Safe Standards
- Working with Vulnerable People (Background Checking) Act 2011 (ACT)
- Child Protection (Working with Children) Act 2012 (NSW)
- Care and Protection Act of Children (NT)
- Working with Children (Risk Management and Screening) Act 2000 (QLD)
- Working with Children Act 2005 (VIC)
- Working with Children (Criminal Record Checking) Act 2004 (WA)
- National Model Code and Guidelines



References

- Education and Care Services National Regulations 2011
Education and Care Services National Law Act 2010 (Cth) applies in Victoria and has been adopted via application acts in NSW, ACT, NT, SA and Tasmania
- Education and Care Services National Law (Queensland) Act 2011 (Qld)
- Education and Care Services National Law (WA) Act 2012 (WA)
- Amendments to all ECSNR and Law

Version Control	Date	Author	Description of Change
1.0	Oct 2013	AEG	Update to reflect ECSNR NQS
1.1	Oct 2014	AEG	Revision
1.2	April 2015	AEG	Add conflict of interest
1.3	May 2016	AEG	Add legislation
1.4	June 2016	AEG	Revision and formatting
10.16	Oct 2016	AEG	Merge centre based and CSO
4.17	Apr 2017	AEG	Added value strategies
10.17	Oct 2017	AEG	Minor amendment
2.18	Feb 2018	AEG	NQS update
10.18	Oct 2018	AEG	Minor amendment
5.19	May 2019	AEG	Minor amendment
8.19	Aug 2019	AEG	Minor amendment
10.19	Oct 2019	AEG	Minor amendment
10.20	Oct 2020	AEG	Scheduled review
10.21	Oct 2021	AEG	Scheduled review
12.22	Dec 2022	AEG	Scheduled review
7.23	July 2023	AEG	Expanded personal device use and child safety
8.23	Aug 2023	AEG	Family values and personal topics
11.23	Nov 2023	AEG	RACI table and reference added
10.24	Oct 2024	AEG	Scheduled review
11.24	Nov 2024	AEG	Added gift declaration form
V11.1	Apr 2026	AEG	Added NSW reform information

Responsible = those who are responsible for carrying out the task

Accountable level 1 = the owner and person accountable for the sign off or approval of a task

Accountable level 2 = the person who is accountable for the task being carried out

Consulted = the person to be consulted with and whose input, opinions and feedback are crucial to the task

Informed = the person who should be informed and made aware of the task and any updates

Policy Written by: Jacqueline Day	Position: Policy and Process Lead	Date: Apr 2026
Approved by: Head of HR	Approved Date: Apr 2026	Next review date: Oct 2026