

GCA Code of Conduct

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1. Purpose

Group Colleges Australia's ("GCA") Code of Conduct (the "Code") establishes the standards of behaviour expected of all GCA board members, employees, contractors, students, volunteers, partners and associates of GCA. This Code is intended to ensure that all members of the GCA community conduct themselves in a manner consistent with the values and principles of GCA, fostering a respectful, ethical, and highly professional environment.

2. Scope

This Code applies to all board members, employees, contractors, students, volunteers, partners, associates and any other individuals engaged in activities under the auspices of GCA, including on-campus, off-campus, and online environments.

For the purposes of referencing the scope application of the Code for brevity throughout the Code document, this will be referenced as 'employees and associates' of GCA.

3. Guiding Principles

GCA is committed to upholding the following guiding principles:

- a) **Respect:** Treating all individuals with dignity, consideration, empathy and recognising the worth and rights of others.
- b) **Excellence:** Striving for the highest standards in education, research, and professional conduct.
- c) **Accountability:** Taking responsibility for one's actions and their impact on others and the GCA community.
- d) **Diversity and Inclusion:** Valuing and promoting diversity, diverse perspectives and fostering an inclusive environment where all individuals feel heard, valued, and supported, and ensuring inclusivity and a sense of belonging in all activities, events and interactions.
- e) **Speaking Up:** We encourage a culture of openness where employees and associates can raise their concerns. It is important to ensure that all concerns are raised with honesty, respectfully and supported by consistent and detailed facts.
- f) **Integrity:** Acting with honesty, ethics and strong moral principles. The Ethical Decision-Making flow chart (Figure 1) has been designed to assist in working out the right approach to decisions being made in relation to this Code and other GCA policies.

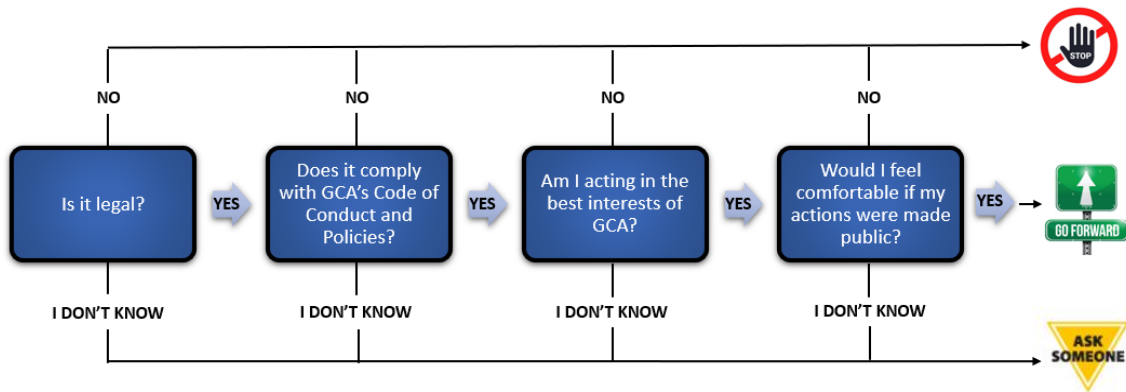


Figure 1- Ethical Decision-Making Flow Chart

4. Compliance with Laws, Regulations, Policies and Accreditation Requirements

GCA is committed to maintaining compliance with all laws, regulations and accreditation requirements, including those set by TEQSA and the ESOS Act. Employees and associates must:

- a) Comply with all applicable local, state, and federal laws, as well as GCA policies and regulations.
- b) Be familiar with and adhere to GCA's policies that ensure compliance with TEQSA's standards and requirements.
- c) Actively contribute to GCA's efforts to meet and exceed regulatory requirements, including participating in internal audits, assessments, and reviews.
- d) Promptly report any issues that may affect GCA's regulatory compliance or any suspected breaches of the law, this Code, or other GCA policies to the appropriate GCA management.
- e) Take personal responsibility in keeping abreast of GCA policies (new and amended) including reading these policies and undertaking any required compliance training.

5. Respectful Work Environment

GCA is committed to fostering a respectful work environment that values people and is conducive to a high standard of work and excellence in academic outcomes and practices. All members of the GCA community are entitled to be treated with respect and given equal opportunities regardless of personal, social or cultural characteristics, and have the right to experience a safe work environment free from unfair treatment, discrimination, harassment, racism, sexual harassment, victimisation, vilification or bullying. Employees and associates of GCA are required to foster a respectful work environment by:

- a) Being mindful of how their words and actions might be received.
- b) Discouraging behaviour that could lead to a hostile work environment. This includes but is not limited to offensive, humiliating or intimidating behaviour towards others or

behaviour that could otherwise make a person feel unsafe or unwelcome in the workplace.

- c) Being aware of signs that others are being harassed or bullied in the workplace.
- d) Refraining from conduct that discriminates based on a range of protected attributes such as age, disability, race, including colour, national or ethnic origin or immigrant status, sex, pregnancy, marital or relationship status, family responsibilities or breastfeeding, sexual orientation, gender identity or intersex status, or any other category protected by applicable law¹.
- e) Reporting any instances of disrespectful behaviour whether or not being the direct target of the conduct, including as a bystander.

6. Professional Behaviour

All members of the GCA community are expected to:

- a) **Maintain Professionalism:** Uphold the highest standards of professional behaviour, including punctuality, responsiveness, appropriate attire and preparedness.
- b) **Respect Confidentiality:** Protect confidential information related to students, employees, and GCA, in accordance with privacy laws, regulations and GCA policies.
- c) **Communicate Respectfully:** Engage in open, honest, and respectful communication, free from discrimination, harassment, or bullying. Be timely, kind and intentional with multi-directional exchange of feedback.
- d) **Avoid Conflicts of Interest:** Disclose any potential or actual conflicts of interest and take steps to avoid situations where personal interests could improperly influence judgment and decision-making.

7. Conflict Resolution and Grievance Handling

GCA is committed to ensuring a respectful and collaborative workplace where conflicts and grievances are addressed promptly and fairly. This section outlines the principles and high-level procedures for resolving conflicts and handling grievances, which align with the *GCA Staff Grievance Policy and Procedure* and the *Grievance Policy (Non-Academic)*.

a) Guiding Principles for Conflict Resolution and Grievance Handling

- i. **Respect and Confidentiality:** Conflicts and grievances are managed with respect and confidentiality, in line with GCA's commitment to fair treatment as outlined in both the *GCA Staff Grievance Policy and Procedure* and the *Grievance Policy (Non-Academic)*.
- ii. **Promptness and Fairness:** All grievances are handled promptly and impartially, with adherence to procedural fairness, natural justice, and consistent application across GCA.

¹ Source: [Human Rights Commission](#)

- iii. **Commitment to Resolution:** Parties are encouraged to work collaboratively toward constructive resolutions, understanding that a respectful, solutions-focused approach is essential.

b) Informal Resolution Process

- i. **Direct Communication:** Employees are encouraged to resolve minor conflicts directly and respectfully with the other party. When appropriate, managers or People and Culture may facilitate these discussions.
- ii. **Seeking Support:** If resolution is not possible directly, employees may seek guidance from their manager or People and Culture, as described in the *GCA Staff Grievance Policy and Procedure* and the *Grievance Policy (Non-Academic)*.

c) Formal Grievance Process

- i. **Filing a Grievance:** For grievances unresolved informally, or for serious matters (e.g., discrimination or harassment), a formal grievance may be submitted in writing to People and Culture. Detailed guidelines are provided in the *GCA Staff Grievance Policy and Procedure* and the *Grievance Policy (Non-Academic)*.
- ii. **Investigation:** Upon receiving a formal grievance, an impartial investigation is conducted if necessary. The investigation will ensure that all parties are treated fairly, with adherence to confidentiality as per the grievance policies.
- iii. **Resolution and Follow-up:** Following the investigation, a resolution will be determined and communicated to all parties. Corrective action will be taken as appropriate, with People and Culture monitoring to ensure compliance and prevent retaliation.

d) Appeals Process

- i. **Appeal Submission:** If dissatisfied with the grievance outcome, parties may submit a written appeal to the CEO, or their appointed equivalent within 10 business days, as outlined in the *Grievance Policy (Non-Academic)*. The appeal will undergo an independent review to ensure fairness.
- ii. **Final Decision:** The outcome of the appeal process will be communicated in writing, and decisions are final, in line with procedural fairness standards stated in GCA's grievance policies.

e) No Retaliation Policy

- i. **Protection Against Retaliation:** GCA prohibits retaliation against individuals who raise or participate in a grievance process in good faith, as described in both grievance policies. Retaliation will be considered a serious breach and may result in disciplinary action up to and including termination.

8. Crisis Management and Emergency Procedures

GCA is committed to maintaining a safe environment and ensuring preparedness for emergencies and crises. Employees and associates must:

- a) Be familiar with and follow GCA's crisis management and emergency procedures, including evacuation protocols, lockdowns, and first aid measures.
- b) Participate in regular training and drills to ensure they are equipped to respond effectively to emergencies.
- c) Immediately report any incidents or risks that could escalate into an injury or a crisis situation to the management.

9. Health, Safety, and Wellbeing

GCA is committed to providing a safe and healthy environment and recognises the importance of mental health and wellbeing for all employees, students, and associates. All employees and associates must:

- a) **Comply with Safety Legislation and Regulations:** Follow all safety policies and procedures to prevent injury or illness.
- b) **Promote Wellbeing:** Contribute to a positive and supportive environment that promotes psychological and physical wellbeing.
- c) **Psychosocial Safety:** Recognise and address psychosocial safety risks and hazards, including stress, bullying, harassment, and any other factors that may impact the psychological health and safety of members of the GCA community. GCA is committed to identifying, assessing, and mitigating these risks to create a supportive and healthy workplace and learning environment.
- d) **Report Hazards:** Promptly report any hazards, incidents, near misses or unsafe practices through the appropriate internal channels, committees and reporting systems.

10. Safeguarding Student Wellbeing

GCA is dedicated to providing a safe, supportive, and inclusive environment for all students. Employees and associates must:

- a) Proactively ensure that the learning environment promotes student's psychological, emotional, and physical wellbeing.
- b) Report any concerns regarding student safety, welfare, or wellbeing to the designated program manager or relevant GCA departments.
- c) Participate in regular training on safeguarding and student welfare to ensure compliance with regulatory requirements and best practices.

11. Working with Children Checks (WWCC)

GCA is committed to ensuring the safety and wellbeing of children and young people in accordance with its legal and moral obligations. Relevant employees and associates engaged in child-related work or come into contact with children and young people at their worksite must hold a valid Working with Children Check (WWCC) in accordance with GCA's Working with Children Policy and relevant legislation.

- a) **Obligation to Maintain Compliance:** Employees and associates are responsible for ensuring their WWCC remains current (at their own expense and as a condition of employment) and for promptly notifying GCA of any changes to their WWCC status, including suspensions, expirations, charges, sentencing, allegations or refusals. Failure to comply with this requirement may result in suspension from duties or disciplinary action, up to and including termination of employment.
- b) **Verification:** GCA reserves the right to verify WWCC status before employment and at regular intervals throughout an individual's employment or engagement with GCA. This includes requesting employees and associates to undergo probity checks, including police checks.
- c) **Reporting Obligations:** Any individual who becomes aware of a potential risk to children or young people as defined in GCA's Working with Children Policy must report this information to the appropriate authority within GCA without delay. GCA is committed to ensuring all reports are handled confidentially and sensitively, in compliance with mandatory reporting obligations.
- d) **Training:** All employees who are required to hold a WWCC must also complete mandatory compliance training on child protection and GCA's reporting procedures, ensuring awareness of their responsibilities in safeguarding children and young people.

12. Diversity, Equality and Cultural Awareness

GCA values diversity and is committed to fostering an inclusive environment that promotes equality, cultural awareness and a sense of belonging.

- a) **Anti-Discrimination, Bullying, Racism, Harassment and Victimisation:** GCA employees and associates must refrain from any form of discrimination, bullying, racism, harassment and victimisation.
- b) **Inclusive Practices:** GCA encourages the promotion of inclusive practices and behaviours that respect the diverse backgrounds and perspectives of all community members.
- c) **Support for Belonging Initiatives:** GCA employees and associates are encouraged to participate in and support GCA's belonging initiatives to foster an inclusive campus culture.
- d) **Cultural Awareness and Sensitivity:** GCA employees and associates will engage in continuous learning about cultural awareness, sensitivities and practices, especially in relation to student cohorts.

13. Personal Relationships in the Workplace

In accordance with *GCA's Conflict of Interest Policy Staff and Students*, a conflict of interest may arise where a GCA employee and associates are working with family members or with persons with whom they develop close personal relationships or such relationships exist with prospective employees, contractors or suppliers.

a) *Personal and family relationships between employees*

Examples of such conflicts of interest include, for example when one employee is:

- i. involved in a decision relating to the selection, appointment or promotion of another.
- ii. in a supervisory relationship to another and responsible for employment-related decisions. Such decisions could include the provision of opportunities and resource allocation for research, conferences and employee training and development; referee reports; remuneration increases, or annual performance development reviews.
- iii. appointed to an appeals committee and has or has had a close personal relationship with another individual who is involved in the decision under appeal.
- iv. appointed to a GCA committee established to select the recipient of an award and another individual with a close personal relationship to the individual is a candidate for the award.

b) *Personal and family relationships between employees and students*

A conflict of interest arises where an individual has or has had a close personal relationship with a student for whom the individual has academic, administrative or other responsibilities. Such responsibilities may include:

- i. the supervision of students;
- ii. the assessment of students;
- iii. the selection of students for admission;
- iv. assessment of recognition of prior learning (RLP);
- v. the awarding of scholarships; or
- vi. the provision of referee reports.

GCA employees and associates must adhere to:

- c) **Disclosure Requirements:** GCA employees and associates must disclose any personal relationships that could lead to conflicts of interest, particularly where one party holds a position of authority over another (for example but not limited to, a supervisor-subordinate, a leader of a function or campus, or lecturer-student relationship). This includes any personal relationships that exist or existed prior to the introduction of this Code. If in doubt about required disclosures, report anyway to GCA management, who will clarify disclosure requirements.
- d) **Avoiding Conflicts:** To prevent conflicts of interest and maintain objectivity in the workplace, individuals who are related or in a close personal relationship cannot be placed in direct reporting lines or within the same immediate function or team. In situations where this arises, GCA reserves the right to take appropriate measures in consultation with relevant parties, such as adjusting reporting lines or supervisory duties, to mitigate any real or perceived conflict of interest.

- e) **Professional Boundaries:** GCA employees and associates must maintain appropriate professional boundaries, ensuring that personal relationships do not influence decision-making, assessment, judgment or workplace dynamics.

14. Employment of Students

GCA recognises the importance of maintaining the integrity and confidentiality of its operations, including student records and sensitive information. Whilst acknowledging that students who complete their studies and become employees of GCA provides mutually rewarding benefits to both parties. However, in order to avoid conflicts of interest and manage risk, GCA generally does not permit the employment of current students. This policy is intended to safeguard both GCA's operations and the privacy of its student body.

- a) **General Principle:** In the interest of avoiding conflicts of interest and ensuring the confidentiality of sensitive GCA information, GCA's policy is that students currently enrolled at GCA are not generally eligible for employment within GCA. This includes any roles that may provide access to GCA documents, records, or systems, particularly those that contain student information.
- b) **Conflict of Interest:** Employing students may create a conflict of interest, particularly if the student gains access to confidential academic, administrative, or personal information about other students, faculty, or staff. This could compromise the integrity of both GCA's operations and the student's academic standing.
- c) **Risk Management:** In addition to concerns about access to sensitive information, employing current students could lead to other risks, such as the perception of preferential treatment or issues related to dual roles (student/employee) that may complicate interactions with peers, faculty, and staff.
- d) **Existing Student Employees:** GCA acknowledges that some students are already employed by GCA in various capacities. This Code is not intended to penalise or exclude these individuals, as their employment commenced prior to the implementation of the Code. GCA management will work closely with these students to ensure that their roles do not create conflicts of interest, and appropriate safeguards will be put in place to manage any risks related to their dual status. This may include adjusting responsibilities or implementing confidentiality agreements.
- e) **Future Considerations:** GCA remains committed to offering employment opportunities that support students' career development and prospects. However, any future employment of enrolled GCA students will be considered on a case-by-case basis, taking into account the need to manage conflicts of interest and maintain operational integrity. In exceptional circumstances where employment of a GCA enrolled student is permitted, the student's role will be designed to ensure it does not involve access to sensitive or confidential information.

15. Secondary Employment/Outside Work

In valuing the expertise of its people, we recognise that employees may engage in paid or unpaid outside employment or private practice. A conflict of interest arises where an employee's secondary employment or outside work activities create or appear to create a

situation where they may not be undertaking work and making decisions in the best interests of GCA and/or may not be giving their full commitment to GCA in terms of work attendance, performance and behaviour.

A conflict of interest may arise, for example, where secondary employment:

- i. is undertaken during the same hours that an individual is being remunerated as a GCA employee or contractor.
 - ii. imposes an obligation on an individual to devote so much time to their secondary employment that the amount or quality of their work for GCA is compromised.
 - iii. makes use of any GCA facility, equipment or resource including computer software and information technology resources.
 - iv. makes use of, or may benefit from, commercial or other information that the individual possesses by virtue of their employment or engagement with GCA.
 - v. occurs within an organisation that may compete with GCA for funds, employees, students, projects, consultancy or in any other activity.
 - vi. occurs within an organisation that supplies GCA goods or services.
 - vii. creates a commitment outside of GCA that involves frequent or prolonged absence(s) from GCA.
- a) If undertaking outside work, GCA employees must ensure that:
- i. it does not adversely impact on their ability to fulfil obligations to GCA.
 - ii. it does not interfere with GCA's work health and safety obligations.
 - iii. prior approval has been obtained from GCA management, including for employees and associates who were employed prior to the introduction of the Code.

16. Continuous Professional Development (CPD)

GCA promotes Continuous Professional Development (CPD) for all employees and associates to enhance the quality of teaching, research, administration and other services. All employees and associates must:

- a) Engage in ongoing professional development activities relevant to their roles.
- b) Ensure that their skills and qualifications remain current, in line with evolving industry standards and TEQSA requirements.
- c) Participate in professional development programs organised by GCA or external organisations as required by specified employees to maintain high levels of competency and integrity.

- d) Provide relevant information to GCA in relation to professional development, qualifications and career development as required by regulators for accreditation purposes or for GCA's record management.

17. Acceptance of Gifts, Benefits and Hospitality

GCA employees and associates have a responsibility to behave with integrity and impartiality and must avoid situations where accepting gifts, benefits or hospitality could be perceived as compromising their integrity or independence, and create a conflict of interest.

- a) **Prohibited Gifts:** Employees must not seek or accept gifts that could be reasonably perceived as influencing them, particularly from people or organisations about whom they are likely to make decisions involving:
 - i. tender processes;
 - ii. procurement;
 - iii. enforcement;
 - iv. licensing;
 - v. regulation;
 - vi. recruitment processes; or
 - vii. student enrolment/GCA entry procedures.
- b) **Nominal Gifts:** Modest gifts of nominal value, that is AUD\$100 and under may be accepted if they are in accordance with GCA policies and do not create an obligation or expectation.
- c) **Declaration:** Any gifts, benefits or hospitality accepted must be declared to the appropriate GCA management, and the acceptance must comply with the GCA's policies on gifts and benefits.
- d) **Gifts to GCA:** Any gifts offered in ceremonial exchanges (e.g. plaques, souvenirs etc.) should be appropriately displayed in GCA's campuses.

18. Environmental Sustainability

GCA is committed to reducing its environmental impact and promoting sustainability. Employees and associates are expected to:

- a) Minimise waste and energy consumption.
- b) Support recycling programs and sustainable practices within GCA.
- c) Integrate sustainability into their day-to-day activities, ensuring compliance with GCA's environmental policies.

19. Academic Integrity

GCA is dedicated to maintaining a culture of academic integrity. All members of the GCA community must:

- a) **Adhere to Academic Standards:** Ensure that all academic work is conducted honestly, fairly, and with complete integrity.
- b) **Avoid Plagiarism:** Properly acknowledge the work of others and avoid any form of plagiarism.
- c) **Promote Fairness:** Ensure that assessments and evaluations are conducted impartially and based on merit.
- d) **Adopt AI watermarks:** Where Generative AI resources have been used clearly indicate by watermark that AI has been used in the creation of the work.

20. Ethical Research Conduct

All research conducted under the auspices of GCA must adhere to the highest ethical standards. Researchers are expected to:

- a) **Comply with Ethical Guidelines:** Follow all relevant national and GCA guidelines for ethical research.
- b) **Respect Participants:** Ensure that all research participants are treated with respect, dignity, and fairness.
- c) **Report Accurately:** Maintain the integrity of research data and report findings honestly and transparently.

21. Academic Freedom and Freedom of Expression

GCA fosters an environment conducive to critical inquiry and supports the principles of academic freedom and freedom of expression as core values of higher education. Employees and associates must:

- a) Respect the right of colleagues and students to express their views, engage in open discussion, and pursue scholarly inquiry within professional and respectful boundaries without fear of discrimination or retaliation.
- b) Ensure that their own exercise of academic freedom respects the rights of others and complies with GCA's policies and applicable legal standards.

22. Use of GCA Resources

GCA employees and associates are responsible for the proper use of GCA resources, including:

- a) **Responsible Use:** Ensure that GCA resources, including facilities, equipment, and funds, are used efficiently, ethically, legally and for their intended purposes.

- b) **Digital Etiquette:** Use digital platforms and resources responsibly, adhering to GCA policies on acceptable use of technology and social media.
- c) **Environmental Responsibility:** Act in ways that support sustainability and minimise environmental impact.

23. Confidential Information and Privacy

In the course of carrying out the GCA's business activities, employees and associates of GCA will have access to personal information of individuals, as well as access to other confidential information. GCA is committed to protecting the confidentiality and privacy of all such information at all times.

- a) **Maintaining Confidential Information:** GCA employees and associates have an obligation to GCA to maintain the confidentiality of confidential information of GCA that comes into their possession.
- b) **Privacy:** Employees and associates are also required to comply with the Privacy Act 1988, including the 13 Australian Privacy Principles (APPs), along with GCA's Privacy Policy and any other relevant privacy legislation when collecting, using, storing, securing and disclosing personal and health information.

24. Intellectual Property and Copyright

GCA values and respects intellectual property (IP) rights, and all GCA employees and associates are expected to adhere to these principles in their work and study.

- a) **Ownership of IP:** GCA employees and associates must respect the ownership of IP created by others and must not use it without appropriate permissions or attributions.
- b) **Use of GCA IP:** Any IP created by employees in the course of their employment, or by students using GCA resources, is owned by GCA, subject to specific agreements or policies.
- c) **Copyright Compliance:** All GCA employees and associates must comply with copyright laws and GCA policies regarding the use, sharing, and reproduction of materials.

25. Digital and Data Privacy

GCA is committed to maintaining the highest standards of digital security and data privacy. Employees and associates must:

- a) Adhere to GCA's cybersecurity protocols to protect sensitive information.
- b) Report any suspected data breaches, scams or cybersecurity risks immediately to IT.
- c) Handle personal and GCA data in compliance with data privacy laws and GCA's Privacy Policy.

26. Ethical Use of Artificial Intelligence (AI) and Emerging Technologies

GCA recognises the potential of AI and emerging technologies to enhance learning, research, and operational efficiency. Employees and associates must:

- a) Use AI and other emerging technologies responsibly and ethically, ensuring that their use does not compromise academic integrity, privacy, confidential information or fairness.
- b) Disclose and receive approval for the use of AI tools in academic work, research and operational activities to ensure transparency.
- c) Stay informed of evolving regulations and ethical standards around AI and emerging technologies and apply them within their roles.

27. Cybersecurity and Information Governance

GCA is committed to protecting the integrity and confidentiality of digital assets, including data on staff, students, and research activities. Employees and associates must:

- a) Follow best practices for data protection, including password management, access controls, and data encryption.
- b) Report any suspicious activity or potential data breaches to IT Support immediately.
- c) Use GCA's digital resources responsibly, adhering to cybersecurity policies and data governance standards to prevent unauthorised access, data breaches, or misuse of information.

28. Social Media Conduct

The use of social media by GCA employees and associates should reflect the professional and ethical standards expected by GCA.

- a) **Responsible Use:** GCA employees and associates must use social media responsibly, ensuring that their posts do not harm the reputation of GCA, infringe on others' rights, or breach GCA policies.
- b) **Confidentiality:** Confidential GCA information must not be shared on social media platforms. If in doubt, GCA and employees should act with considered caution or seek out the advice of GCA management.
- c) **Personal Views:** GCA employees and associates should clearly distinguish between personal views and those of GCA when posting on social media and state this accordingly on any social media posts, notwithstanding 28 a) and 28 b).

29. External Engagement and Public Comment

When engaging with external parties or making public comments, GCA employees and associates must ensure that their actions align with GCA's values, policies and position on matters.

- a) **Public Representation:** GCA employees and associates must not represent GCA in any public forum unless authorised to do so.
- b) **Respectful Engagement:** When engaging with external stakeholders, GCA employees and associates must do so with professionalism and in a manner that upholds the reputation of GCA.
- c) **Media Relations:** Any interaction with the media should be coordinated through GCA's designated media relations contact to ensure consistency and accuracy.

30. International Business

GCA will comply with all local and foreign laws.

- a) **Representation:** GCA will be accurate and truthful in representing business transactions to overseas partners and agencies.
- b) **Understanding of laws:** GCA will obtain appropriate level of understanding of the laws associated in dealing with overseas partners and agencies.

31. Anti-Modern Slavery

GCA is committed to combatting all forms of modern slavery to ensure that our operations, supply chains, and partnerships are free from modern slavery practices and that we promote ethical labour standards. This includes:

- a) **Commitment to Ethical Operations:** GCA is committed to upholding human rights in all its operations, regularly monitoring that there is no form of modern slavery or exploitation present in our activities or those of our suppliers, contractors, agents or partners.
- b) **Supply Chain and Partner Due Diligence:** GCA will implement thorough due diligence measures in its procurement and contracting processes to assess and address the risk of modern slavery. All suppliers, contractors, agents and partners must adhere to ethical labour standards and comply with the requirements set forth in the *Modern Slavery Act 2018 (Cth)* (*Modern Slavery Act*).
- c) **Supplier and Contractor Obligations:** GCA expects all third-party suppliers and contractors to comply with the principles of the Modern Slavery Act. Any supplier or contractor that fails to meet these obligations or is found to be engaging in modern slavery practices may face contract termination and other appropriate actions by GCA.
- d) **Risk Assessment and Mitigation:** GCA will assess modern slavery risks within its operations and supply chains and take proactive steps to mitigate any identified risks. This includes reviewing and updating procurement policies, contracts, and procedures to ensure compliance with anti-modern slavery legislation.
- e) **Reporting Modern Slavery Concerns:** GCA employees and associates are encouraged to report any concerns regarding modern slavery within GCA's operations or supply chains. Reports can be made confidentially through GCA's established reporting mechanisms, including under the Whistleblowing Policy.

32. Anti-Bribery and Anti-Corruption

GCA is committed to upholding the highest standards of ethical conduct, including strict compliance with anti-bribery and anti-corruption laws in all aspects of its operations. This commitment is essential in maintaining the integrity of GCA as an education provider and ensuring compliance with relevant higher education sector regulations.

- a) **Prohibition of Bribery and Corruption:** GCA prohibits all forms of bribery and corruption, whether direct or indirect. Employees and associates must not offer, give, solicit, or accept any bribe, kickback, or any other form of inducement that could improperly influence any decision related to GCA's business activities.
- b) **Compliance with Laws:** All GCA employees and associates must comply with the relevant anti-bribery and anti-corruption laws, including Australian legislation such as the *Criminal Code Act 1995 (Cth)*, and international standards that may apply during GCA's interactions with foreign entities or stakeholders.
- c) **Due Diligence:** GCA will conduct thorough due diligence when engaging with third parties, including contractors, suppliers, and partners, to ensure they adhere to the same anti-bribery and anti-corruption standards.
- d) **Reporting and Accountability:** Employees and associates are encouraged to report any suspicions or concerns regarding bribery or corruption through GCA's whistleblowing channels. GCA will ensure that all reports are investigated impartially and will protect Whistleblowers from retaliation.

33. Risk Management and Compliance

GCA takes a proactive approach to identifying and managing risks that may affect GCA's integrity, reputation, and compliance obligations. Employees and associates must:

- a) Be aware of GCA's risk management strategies and contribute to identifying, assessing, and mitigating risks in their areas of responsibility.
- b) Comply with all internal policies and procedures that address risk exposure and uphold the GCA's commitment to meeting TEQSA accreditation standards.
- c) Actively participate in risk management training to stay informed of their roles in maintaining compliance with relevant legal and regulatory obligations.

34. Financial Integrity

All financial activities undertaken by GCA employees and associates must be conducted with the highest standards of integrity and in compliance with GCA policies.

- a) **Accurate Record-Keeping:** GCA employees and associates must ensure that all financial records are accurate, complete, and transparent.
- b) **Use of Funds:** College funds must be used only for legitimate business purposes and in accordance with approved budgets and GCA policies.

- c) **Expense Reconciliation:** GCA employees and associates who incur expenses on behalf of GCA, including on a company credit card must ensure that all expenses are business related, properly documented, and reconciled in a timely manner. This includes submitting official receipts and explanations for all expenditures in accordance with GCA's expense reporting and claiming procedures.
- d) **Company Credit Cards:** GCA employees and associates entrusted with a company credit card must use it strictly for authorised business-related expenses and must reconcile all charges promptly and accurately in accordance with *GCA's Corporate Credit Card policy*. Unauthorised or personal use of company credit cards, including but not limited to sharing of company credit card and/or PIN with others, is prohibited and may result in disciplinary action and reimbursement to GCA by the employee of unreconciled expenditure.
- e) **Fraud Prevention:** GCA has a zero-tolerance approach to fraud, and any suspected fraudulent activity must be reported immediately and may result in disciplinary action, up to and including termination of employment.

35. Records Management

GCA is legally bound to adhere to proper records management practices and procedures. GCA employees and associates must not damage, dispose of, or in any other manner interfere with official documents or files.

36. Reporting and Whistleblowing

GCA supports a culture of transparency and accountability by encouraging the reporting of misconduct or breaches of this Code.

- a) **Safe Reporting:** GCA employees and associates who become aware of any misconduct or unethical behaviour are encouraged to report it to the appropriate GCA management without fear of retaliation.
- b) **Protection for Whistleblowers:** GCA will protect whistleblowers from any adverse consequences or retaliation as a result of making a report in good faith.
- c) **Investigation Process:** All misconduct and whistleblower reports will be investigated promptly, fairly, and confidentially, in accordance with the relevant GCA policies.

37. Breaches of the Code

If GCA employees and associates are found to have breached this Code, GCA may take such action that it considers appropriate in the circumstances. Such action may include, but not limited to:

- a) Counselling, training or retraining.
- b) Formal warning.
- c) Taking disciplinary measures, including termination of employment.



- d) Termination of title or termination of other engagements or relationships with GCA and/or revocation of access to GCA’s services or facilities.

The process for addressing breaches will be fair, transparent, and consistent with relevant GCA policies and legal requirements.

38. Review and Updates

This Code will be reviewed regularly to ensure it remains current and reflective of best practices in the higher education sector. Any updates or changes will be communicated to all members of the GCA employees and associates as appropriate and able via the normal communication medium.

39. Requirement to Read and Acknowledge Code

All GCA employees and associates are required to read this Code as part of their onboarding process with GCA. Additionally, all GCA Board members and employees must review and acknowledge their understanding of the Code annually at a time determined by GCA as part of GCA’s ongoing compliance framework. This annual review is part of ongoing training and education to ensure that all members of the GCA community remain informed and compliant with the standards and expectations set forth in this Code.

40. Roles and Responsibilities

Position	Responsibility
GCA Board	<p>Role model expectations required of the Code to the highest standard.</p> <p>Be advised on any updates to this Code and approve Code changes.</p> <p>Complete the annual compliance review and acknowledgment of the Code.</p>
Chief Executive Officer (CEO)	<p>Role model expectations required of the Code to the highest standard.</p> <p>Be consulted on any proposed updates to this Code and endorse proposed Code changes ahead of going to the Board.</p> <p>Ensure that managers are held accountable for the implementation of this Code in their areas of oversight.</p> <p>Advise the Board in conjunction with People and Culture promptly on any organisational risks or significant breaches in relation to this Code and take responsibility for managing and mitigating those risks.</p> <p>Submit information to authorities, regulators or external agencies as required in relation to this Code through the appropriate internal delegation channels.</p>

Position	Responsibility
	<p>Complete the annual compliance review and acknowledgment of the Code.</p>
<p>Executive Management Team/Campus Managers</p>	<p>Role model expectations required of the Code to the highest standard.</p> <p>Make recommendation on any required Code changes to People and Culture.</p> <p>Be consulted on any proposed updates to this Code and endorse proposed Code changes ahead of going to the Board.</p> <p>Ensure this Code is implemented within their areas of oversight.</p> <p>Report promptly to the CEO and People and Culture of any breaches of this Code.</p> <p>Complete the annual compliance review and acknowledgment of the Code.</p>
<p>People Leaders and Supervisors</p>	<p>Role model expectations required of the Code to the highest standard.</p> <p>Ensure that their employees have access to this Code, have read it, and that employees are aware of their obligations.</p> <p>Ensure this Code is implemented within their areas of responsibility.</p> <p>Ensure employees in their area of oversight complete the annual review and acknowledgement of this Code.</p> <p>Report any breaches of this Code and work with People and Culture and work with People and Culture in response to those breaches.</p> <p>Complete the annual compliance review and acknowledgment of the Code.</p>
<p>People and Culture</p>	<p>Is the owner and author of this Code.</p> <p>Stay abreast of legislative and sector changes as relevant to this Code, and keep management updated.</p> <p>Make recommendations to the CEO and the EMT CEO on any required or proposed Code updates and undertake to make those changes to the Code as approved.</p> <p>Consult with the Compliance Manager on Code updates/amendments.</p> <p>Conduct risk assessments, audits and Code reviews in accordance with this Code, an in consultation with relevant stakeholders.</p>

Position	Responsibility
	<p>Ensure document management and record keeping is maintained of this Code in accordance with GCA's Policy Framework.</p> <p>Ensure relevant compliance training is being completed and review the training content as required.</p> <p>Prepare papers for the GCA Board in recommending changes to the Code or reporting on serious breaches.</p> <p>Complete the annual compliance review and acknowledgment of the Code.</p> <p>Monitor and report on the completion of the compliance training and acknowledgment of the Code as read and understood upon commencement/engagement and annually as required.</p>
<p>Employees, Contractors, Volunteers</p>	<p>Responsible for being aware of their obligations under, and acting accordingly with this Code.</p> <p>Complete the annual compliance review and acknowledgment of the Code.</p> <p>Report suspected or known breaches of this Code to their manager or People and Culture.</p>

41. Related Policies and Supporting Documents

This Code should be read in conjunction with other relevant GCA policies, including but not limited to:

- a) Academic Integrity Policy
- b) Anti-Discrimination and Harassment Policy
- c) Conflict of Interest Policy Staff and Students
- d) Corporate Credit Card Policy
- e) Criminal Code Act 1995 (Cth)
- f) Disciplinary Policy and Procedures (to be written and linked)
- g) Employment contracts
- h) GCA Staff Grievance Policy and Procedure
- i) GCA Grievance Policy (Non-Academic)
- j) GCA Staff Recruitment and Retention Policy
- k) GCA Sexual Misconduct Prevention and Response Policy
- l) GCA Workplace discrimination and harassment policy
- m) IT user policy (To be reviewed/updated)



- n) Modern Slavery Act 2018 (Cth) ('Modern Slavery Act').
- o) Position Descriptions
- p) Privacy Act 1988
- q) Privacy Policy
- r) Social Media Policy
- s) Staff Grievance Policy and Procedure
- t) Workplace Health and Safety Policy
- u) Whistleblower Policy

42. Version Control

Policy Category		GCA	
Responsible Officer		Chief Executive Officer (CEO) or as current, Chair Governance Board & President	
Date of Publication		6 November 2024	
Approved By		GCA Board of Directors	
Next Review Date		October 2026	
Version #	Description of Changes	Authored by	Date Updated
1.0	New Policy	Head of People and Culture	29 October 2024