

<b>Policy</b>	
<b>Code of Conduct</b>	
<b>1. Policy Statement</b>	This Code of Conduct affirms that SAE Institute Pty Ltd (SAE) expects that all staff, students, Academic Board members, Directors and Officers acting on behalf of SAE and visitors to SAE campuses will adhere to the highest standards of professional conduct.
<b>2. Purpose</b>	All staff and students at SAE are expected to carry out their work in an ethical and collegial manner, to perform their duties with efficiency, fairness, impartiality and honesty, and to comply with the provisions of this Code. Compliance with this Code will foster and maintain student, staff, and public trust and confidence in the integrity and professionalism of SAE. Staff are expected to promote and protect the interests of and maintain and enhance the reputation of SAE at all times.
<b>3. Scope</b>	<p>This policy applies in the context of SAE’s operations in Australia and its approved offshore delivery sites, and is applicable to staff, students enrolled with or intending to enrol with SAE, contractors and visitors.</p> <p>Procedures for SAE campuses internationally may vary in compliance with statutory requirements in other countries of operation. Students registered with SAE who transfer their studies to a campus outside Australia, will have their registration with SAE in Australia terminated and are required to adhere to the guidelines, policies and procedures of the legal entity to whom they have transferred their registration. This policy is applicable to all students or prospective students of SAE, irrespective of their place of residence, campus or mode of study.</p>
<b>4. Associated Policies and Procedures</b>	<ul style="list-style-type: none"> <li>• Student Emergency Process</li> </ul>
<b>5. Associated Documents</b>	<p>This Code should be read in conjunction with the policies and rules of both SAE and Navitas Group and with the relevant State or Federal legislation, as appropriate and amended from time to time, which may include but are not limited to, for example:</p> <ul style="list-style-type: none"> <li>• Anti-Discrimination Act 1977 (NSW)</li> <li>• Child Protection (Prohibited Employment) Act 1998 (NSW)</li> <li>• Copyright Act 1968 (Fed)</li> <li>• Crimes Act 1914 (Fed)</li> <li>• Crimes Act 1900 (NSW)</li> <li>• Disability Discrimination Act 1992 (Fed)</li> <li>• Equal Opportunity for Women in the Workplace Act 1999 (Fed)</li> <li>• Human Rights and Equal Opportunity Commission Act 1986 (Fed)</li> <li>• Occupational Health and Safety Act 2000 (NSW)</li> <li>• Occupational Health and Safety Regulation 2001 (NSW)</li> <li>• Privacy and Personal Information Protection Act 1998 (NSW)</li> <li>• Racial Discrimination Act 1975 (Fed)</li> <li>• Sex Discrimination Act 1984 (Fed)</li> </ul>
<b>6. Policy</b>	<p><b>6.1 Respect for Law and Governance</b></p> <p>Staff and students of SAE are required to observe and comply with all relevant Federal and State laws, statutes and prescribed requirements (refer to associated documents section 4 for examples) as well as the policies and rules of SAE.</p> <p><b>6.2 Professional Conduct</b></p> <p><b>6.2.1 Staff</b></p> <p>Professional conduct required by SAE includes, but is not limited to:</p> <ol style="list-style-type: none"> <li>a. A commitment to professional standards in teaching and learning, scholarship, administration and industry involvement;</li> </ol>

- b. Observance and promotion of the rights of students and staff;
- c. Conduct which is professional at all times, and which is respectful of SAE, its students and staff;
- d. Awareness of relevant legislation and adherence to policies and procedures developed by SAE and the Navitas Group.

In conjunction with this code, staff must abide by the provisions of SAE Academic and General Policies.

### 6.2.2 Students

Conduct required by SAE includes, but is not limited to:

- a. A commitment to learning, appropriate methods of scholarship, and appropriate behaviour at all times while on SAE premises, electronic spaces, communications or anywhere where they are presented as an SAE student;
- b. Respectful observance of the rights of fellow students and staff;
- c. Conduct which is fair and has regard to SAE interests;
- d. Awareness of relevant legislation and
- e. Adherence to SAE policies and procedures.

In conjunction with this code, students should also read, familiarise themselves with, and abide by the provisions of the Academic and General Policies.

### 6.3 Academic Freedom

SAE shall:

- a. Promote and support free intellectual inquiry and creative expression; and
- b. Encourage its students and staff to express themselves using critical judgment, innovative practice and scholarship, subject to accepted scholarly practice, SAE agreements, policy and law.

### 6.4 Respect for Individuals

#### 6.4.1 Staff

SAE expects all stakeholders and visitors to its campuses and communications forums to act with integrity, respect, courtesy and fairness. This involves, but is not limited to:

- a. The management of students and staff;
- b. Confidentiality and privacy of individual records;
- c. Decisions that are fair and transparent
- d. A client-centred approach to work;
- e. Avoiding unlawful discrimination, for example on grounds such as: gender, sexual orientation, race, cultural background, religion, or political conviction;
- f. Avoiding behaviour which might reasonably be perceived as corruption, harassment, bullying or intimidation;
- g. Carrying out work in a safe manner and taking precautions to protect the health, safety and welfare of oneself and others;
- h. Complying with any legislative, industrial or administrative requirements;
- i. Avoiding behaviour which might reasonably be perceived as creating an unsafe or unhealthy environment, or constraining the legitimate rights of others;
- j. Respecting an individual's right to privacy and undertaking to keep personal information in confidence;
- k. Respecting privacy laws and confidential information given to them in the course of their employment.

#### 6.4.2 Students

All students of SAE shall treat other members of staff and students as well as visitors and members of the community with respect, courtesy, fairness and equity. This involves, but is not limited to:

- a. Fairness in dealing with students and staff;
- b. Carrying out work with integrity and objectivity;
- c. Avoiding unlawful discrimination, for example on grounds such as: gender, sexual orientation, race, cultural background, religion, or political conviction;
- d. Avoiding behaviour which might reasonably be perceived as corruption, harassment, bullying or intimidation;
- e. Carrying out work in a safe manner and taking precautions to protect the health, safety and welfare of oneself and others;
- f. Complying with any legislative, industrial or administrative requirements;
- g. Avoiding behaviour which might reasonably be perceived as creating an unsafe or unhealthy environment, or constraining the legitimate rights of others;
- h. Respecting an individual's right to privacy and undertaking to keep personal information in confidence;
- i. Respecting privacy laws and confidential information given to them in the course of their employment or enrolment

**6.5 Conflict of Interest**

**6.5.1 Staff**

Staff of SAE should be sensitive to the potential for conflicts of interest, actual and perceived, that may arise between their personal interests and their duties, obligations and responsibilities to SAE, and shall take care to ensure that no actual or perceived conflict of interest arises.

Staff shall avoid situations in which their private interests (whether involving personal financial or pecuniary interests, or external associations, or personal and family relationships between staff or between staff and students) conflict with or could reasonably be perceived to conflict with or influence judgments made during the course of their professional duties, and perceptions that an unfair benefit may have been attained. Potential conflicts of interest should be assessed in terms of the likelihood that a staff member possessing a particular interest could be improperly influenced, or might appear to be improperly influenced in the performance of their duties on a particular matter.

Academic staff have a particular responsibility to their students to assess their work fairly, objectively and consistently across the candidature for a particular module or program.

Because personal relationships between students and staff may involve serious difficulties arising from the unequal power of the parties concerned, as well as difficulties in maintaining appropriate boundaries between professional and personal life, academic staff have a responsibility to declare such potential or actual conflicts of interest to their supervisor as soon as they are aware of such potential conflicts.

Staff who believe there may be a perceived or actual conflict of interest, must immediately inform their supervisor or relevant Campus Manager or Campus Academic Coordinator, who will determine what action is to be taken. In the event of a conflict of interest involving Campus Managers or senior staff of the organisation or an external member of the Academic Board or its committees the member(s) must seek advice from the General Manager or the Chair of the Academic Board of SAE as appropriate.

Members of staff should take particular care not to take part in the following matters in relation to any student with whom they have a personal relationship:

- Selection for entry to any program;
- Academic assessment;
- Selection for any scholarship or prize;
- Project supervision.

Where a potential conflict of interest exists in relation to any student matter the Campus Academic Coordinator or Campus Manager must approve alternative arrangements.

Failure to disclose a conflict of interest may render any associated decisions null and void, and may result in disciplinary proceedings.

**6.5.2 Students**

Students who believe they may have, a conflict of interest, must inform the Academic Coordinator or Campus Manager who will advise on what action is to be taken. In the event of a conflict of interest involving Campus Managers or senior staff or an external member of the Academic Board or its committees, the students must seek advice from the General Manager or the Dean, SAE Southern.

**6.6 Reporting Corrupt Conduct**

Where reasonable evidence exists, staff and students are encouraged to report suspected corrupt conduct, as well as maladministration and serious or substantial waste of resources, to the Campus Manager, Campus Academic Coordinator or National Manager<sup>1</sup>, member of the Executive Management Committee<sup>2</sup>. Privacy and confidentiality should be strictly observed in all such cases, and particular care must be taken to avoid vexatious or malicious allegations.

**6.7 Outside Work and Private Practice**

Full-time staff wishing to engage in outside work, including private practice, must seek approval to do so from the Campus Manager. Approval will be reasonably granted if the request aligns with the educational and professional aim of SAE. A staff member may appeal a decision of the Campus Manager to the General Manager or nominee, whose decision shall be final.

All staff, including those employed for less than full-time, must not accept outside work where it may cause a direct or indirect conflict with their duties for SAE or otherwise adversely impact the conduct of their work or reflect poorly on the reputation and public standing of SAE, or where the possible work is for a competitor organisation. Any such potential direct or indirect conflict must be reported in writing to the Campus Manager in the first instance.

**6.8 Duty of Care and Safety**

**6.8.1 Staff**

Employees are required at all times to work safely and to observe all safety procedures. The staff of SAE must take every precaution reasonable in the circumstances to protect the health, safety and welfare of all those in the workplace. In particular, they must comply with the relevant State and Federal legislation and relevant Codes of Practice as well as specific SAE and Navitas Group, Workplace Health and Safety policies and procedures. Staff should also actively promote safe working practices and environments for everyone using SAE facilities.

Staff should ensure that their personal behaviour does not affect work performance or the health, safety and welfare of others, especially students in their care. Relevant staff should take steps to ensure that all contractors engaged on site are aware of SAE WHS Act obligations and are compliant with Occupational Health and Safety policies and procedures.

**6.8.2 Students**

Students of SAE must take every precaution reasonable in the circumstances to protect the health, safety and welfare of all those in the learning environment. In particular, they must comply with the relevant State and Federal legislation and relevant Codes of Practice as well as specific SAE Workplace Health and Safety policies and procedures. Students should also actively promote safe working practices and environments for everyone using SAE facilities.

<sup>1</sup> National Manager of Academic Services, National Manager of Student Services, National VET Manager, National IT Manager

<sup>2</sup> General Manager,, Director of Academic and Student Services, Director of Finance, Director of Marketing

**6.9 Discrimination and Harassment**

**6.9.1 Staff**

Staff of SAE must not harass or discriminate against their colleagues, students, members of the public, or other persons with whom they may interact with, on the grounds of; gender, marital status, pregnancy, age, race, ethnic or national origin, physical or intellectual impairment, religion, political beliefs, or sexual orientation. Such behaviour may constitute an offence under several Federal Anti- Discrimination laws as well as relevant State Anti-Discrimination laws and will be considered a serious breach of policy. Staff are expected to:

- a. Avoid behaviour which might reasonably be perceived as corruption, harassment, bullying or intimidation;
- b. Carry out work in a safe manner and taking precautions to protect the health, safety and welfare of oneself and others;
- c. Comply with any legislative, industrial or administrative requirements;
- d. Avoid behaviour which might reasonably be perceived as creating an unsafe or unhealthy environment, or constraining the legitimate rights of others;
- e. Respect an individual's right to privacy and undertaking to keep personal information in confidence;
- f. Respect privacy laws and confidential information given to them in the course of their employment.

Staff with supervisory responsibilities must make every effort to ensure that the workplace is free from all forms of harassment and discrimination. They must understand and apply the principles of equal employment opportunity and ensure that the employees they supervise are informed of these principles.

**6.9.2 Students**

Students of SAE must not harass or discriminate against their peers, staff, members of the public or other persons with whom they may interact on the grounds of; sex, marital status, pregnancy, age, race, ethnic or national origin, physical or intellectual impairment, religion, political beliefs or sexual preference. Such behaviour may constitute an offence under several Federal Anti-Discrimination laws as well as the relevant State Anti-Discrimination laws and will be considered a serious breach of policy.

Students must make every effort to ensure that the learning environment is free from all forms of harassment and discrimination.

**6.9.3 Staff/Student Relationships**

Staff are not permitted, under any circumstances, to enter into a romantic, intimate or sexual relationship with an SAE student whilst the staff member is still employed by, or the student is enrolled at, SAE. Staff are expected to show appropriate behaviour towards students at all times.

For examples of inappropriate behaviour please see **Guidelines for Staff / Student Boundaries and Relationships**

**6.10 Diligence**

Staff are expected to be diligent in their work and to carry out their duties in a professional, responsible, and conscientious manner, and to be accountable for their conduct and decisions. They have an obligation to carry out workplace decisions and adhere to policies faithfully and impartially.

All employees of SAE are expected to maintain and enhance their skills and expertise and keep up-to-date the knowledge associated with their particular field or area of work. High standards of performance and a keen focus on client service are expected.

**6.11 Confidential Information**

SAE information must only be used for the work-related purpose intended and not for personal benefit. All employees must make sure that they do not disclose, disseminate or make use of any confidential information, including staff and student records, without prior authorisation or unless specifically authorised by law.

All SAE staff must take reasonable steps to ensure that unauthorised people cannot access any confidential information in any form, physical and electronic, and that sensitive information is only discussed with authorised individuals. Unauthorised disclosure or use of confidential information may result in disciplinary proceedings.

#### **6.12 Use and Security of Personal Information**

All staff have a duty to maintain the confidentiality, integrity and security of SAE information. In addition, staff of SAE have an obligation to:

- a. Ensure that personal information concerning students or staff is secured against loss, misuse or unauthorised access, modification or inappropriate disclosure;
- b. Report to their supervisor, or the Campus Manager, actual or suspected misuse of information.

#### **6.13 Computer usage**

SAE provides computing, internet and email facilities for work purposes, which should at all times be used in a responsible manner, and in compliance with SAE policies applicable legislation.

SAE will not allow excessive or unreasonable personal use of SAE computers and computing systems, and a Campus Manager or senior officer may at any time initiate an audit of SAE email and data files.

##### **6.13.1 Viruses**

Any staff members or students that receive any email or files from a source they do not know, or any email or files which may give rise to concern, should not open them, and must immediately contact their supervisor or campus management or the System Administrator.

##### **6.13.2 Appropriate Use of Communication and Media**

The use of SAE computers, internet and email facilities for the following purposes is expressly prohibited:

- a. Distribution or saving of material that is illegal in Australia or country of destination
- b. Distribution or saving of material that negatively reflects upon a particular race, gender, religious or political belief, nationality, marital status or sexual orientation, or is likely to cause offence.
- c. Illegal distribution of copyrighted material.
- d. Distribution of material that may negatively reflect on SAE reputation, or the issuing of any unauthorised statement as being attributed to SAE.
- e. Carrying out or attempting to carry out impersonation, fraud, misrepresentation of identity, forgery, substitution of mail, headers or any other identification marks.
- f. Using SAE computer systems for gambling or soliciting for personal gain or profit.

#### **6.14 Security of Data**

Staff members must not send, pass on or provide access to any confidential SAE material to unauthorised persons. It is the responsibility of SAE staff member to check all documents and mailing addresses before email is sent to avoid mistakes or inappropriate disclosure of information.

#### **6.15 Security Maintenance**

Staff and on-site contractors must maintain adequate security of SAE premises in which they are working and must maintain security of keys and swipe cards issued to them for the purposes of

opening, accessing and using buildings, vehicles, equipment and other facilities. Keys and access devices are to be used only in the performance of approved and scheduled duties, and use for any other purpose requires the prior approval of the Campus Manager.

#### **6.16 Property**

Unauthorised possession, unauthorised usage or unauthorised removal or relocation of SAE property or the property of other persons without authorisation or permission is strictly prohibited. Note: All serious cases, particularly those related to unauthorised possession of property, will be referred to the Police. Any disciplinary action SAE may take is quite separate from, and additional to, any Police action.

#### **6.17 Attendance**

Staff who are not able to attend work for any reason must make all reasonable effort to advise their manager or supervisor before their starting time on any day of absence. The manager or supervisor must be advised of the reason for the type of absence and the expected date of return to work.

Absences due to sickness longer than one day will normally require presentation of a medical certificate.

Where it is deemed appropriate by SAE, staff may be required to comply with procedures regarding recording of attendance.

#### **6.18 Alcohol and Prohibited Drugs**

Staff, students, contractors and visitors must not attend SAE if they are affected by drugs or alcohol. Being under the influence of drugs and/or alcohol will not be accepted as an excuse for poor behaviour or harassment of either staff or students.

Staff and students who believe they have a drug or alcohol problem are encouraged to seek professional assistance and treatment. Assistance for employees is available through the Employee Assistance Program and students may access SAE's Counselling Services.

The only exception to this is on formal occasions where Management has approved the consumption of alcohol, or at campus accommodation in accordance with accommodation agreements.

##### **6.18.1 Staff**

No alcohol is to be consumed on SAE premises without the express approval of the Campus Manager.

No prohibited drugs are to be brought into SAE premises, and any staff member so involved will be liable to summary dismissal.

Employees on prescription drugs which may impair their personal safety, or the safety of other persons, should report the matter to their manager or supervisor before commencing work.

Any staff member who is suspected of having consumed alcohol or prohibited drugs or who, in the opinion of their manager or supervisor, is not capable of satisfactorily performing normal duties, will be stood down without pay, pending further investigation and disciplinary action.

Staff, contractors or visitors working alongside a colleague whose well-being or job performance whom they perceive to be adversely affected by alcohol or drug use (whether legal or illegal) are encouraged to confidentially share their concerns with their supervisor.

##### **6.18.2 Students**

No alcohol is to be consumed on SAE premises.

	<p>No prohibited drugs are to be brought into SAE premises, and any student so involved may be excluded from studies at SAE.</p> <p>Students on prescription drugs which may impair their personal safety, or the safety of other persons, should report the matter to campus student services staff upon arriving on Campus.</p> <p><b>6.19 Smoke Free Workplace</b></p> <p>By Australian law, all workplaces must be smoke free. All SAE staff, students and visitors must observe rules relating to outdoor smoking areas, or areas near entrances or exits.</p> <p><b>6.20 Media Statements and Social Media Networks</b></p> <p>No staff or students are authorised to make statements to the media, including any social media channels, or to media representatives or public statements relating to any aspect of SAE operations or business without the express approval of the General Manager or nominee.</p> <p><b>6.21 False Declarations</b></p> <p>Willfully making false declarations is strictly prohibited and will be subject to disciplinary action.</p> <p><b>6.22 Breaches</b></p> <p><b>6.22.1 Staff</b></p> <p>Any breach of this Code of Conduct may result in a misconduct investigation and disciplinary action. A serious breach of any of the provisions of this Code by a staff member may result in summary dismissal. Repeated instances of misconduct will be considered as serious misconduct and may constitute grounds for dismissal.</p> <p><b>6.22.2 Students</b></p> <p>Any breach of this Code of Conduct may result in a misconduct investigation and disciplinary action. A serious breach of any of the provisions of this Code by a student may result in suspension of candidature, exclusion from studies. Repeated instances of misconduct will be considered as serious misconduct.</p> <p><b>6.22.3 Criminal Breaches</b></p> <p>Any behaviour or incident that may be criminal in nature, will be reported immediately to the police. This applies to all staff, students, contractors and visitors.</p>
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### Administrative Information and Version Control

Date	Summary of Changes	Approved by
04 June 2014	Policy approved	Managing Director and CEO
17 March 2015	Additional content added	Managing Director and CEO
17 October 2017	Minor revision	Academic Board
8 November 2018	Revision to section 6.18, addition of section 6.9.3, and other minor changes	EMG on 22/05/19