

GRNSW Code of Conduct

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19 September 2023

Introduction

This Code of Conduct applies to those persons performing work for Greyhound Racing New South Wales (**GRNSW**), detailed in the application section below.

The Code of Conduct draws on the values that underpin GRNSW's work.

This Code of Conduct does not apply to the directors of GRNSW. Consistent with the requirements of the *Greyhound Racing Act 2017* (NSW), GRNSW has in place a separate Code of Conduct for its directors.

The Code of Conduct is based on legislation applicable to GRNSW and relevant policies and procedures that apply to GRNSW. Details of key related legislation and policies and procedures are set out at the end of this Code of Conduct.

Purpose

The purpose of this Code of Conduct is to:

1. establish a common understanding of the standards of conduct and behaviour expected by GRNSW of the individuals to whom the Code of Conduct applies;
2. ensure that the activities of GRNSW inspire the utmost faith, public trust, confidence and support of industry participants, stakeholders and the broader community; and
3. detail the consequences of failing to meet the standards of conduct and behaviour required by GRNSW.

The Code of Conduct does not attempt to provide a detailed and exhaustive list of what to do in every aspect of a person's work. Instead, it sets out standards of conduct and behaviour expected by GRNSW and provides a broad framework that will assist in deciding on an appropriate course of action when faced with an ethical issue.

The Code of Conduct places an obligation on everyone to whom it applies to take responsibility for their own conduct and to work with colleagues, industry and the public cooperatively to establish a consultative and collaborative workplace where people are happy and proud to work.

Application

This Code of Conduct applies to anyone performing work for GRNSW, including employees (whether full time, part-time, or casual and whether employed on a temporary or ongoing basis), contractors, consultants and volunteers but excluding the directors of GRNSW (together the **GRNSW Employees**).

This Code of Conduct applies to the conduct of the GRNSW Employees both while they are performing work for GRNSW, and unless otherwise stated, when they are not performing work for GRNSW.

Policy Statements

1. Values

GRNSW's values are:

- Service and Professionalism
- Fairness and Integrity
- Good Welfare and Best Practice
- Trust and Accountability
- Agility and Engagement

These values are what GRNSW stands for and GRNSW Employees are required to conduct themselves at all time in a manner which is consistent with, and furthers the objectives of, these values.

2. GRNSW Employees Conduct and Behaviour

In performing work for GRNSW, the behaviour and conduct of GRNSW Employees must be guided by GRNSW's objectives and its values. All GRNSW Employees must:

- act in the public interest and in the interests of the greyhound racing industry as a whole in New South Wales;
- act diligently and conscientiously to the best of their ability;
- exercise their professional and ethical judgement and carry out their work with integrity and objectivity;
- avoid conflicts of interests;
- act fairly and reasonably and treat members of the public, industry participants, business partners and other GRNSW Employees with respect, courtesy and sensitivity and without discrimination and harassment;
- observe and comply with all applicable legislation, industrial instruments, professional codes of conduct or practice and GRNSW policies and procedures, including in relation to:
 - confidentiality and privacy of information;
 - equal opportunity;
 - work health and safety;
 - the use of GRNSW's resources including information, communication and technology resources; and

- appropriate behaviour while at GRNSW's premises or at any other activity relating to GRNSW;
- strive to keep up-to-date with advances and changes in the body of knowledge and the professional and ethical standards in their area of expertise and in GRNSW;
- maintain a co-operative and collaborative approach to working relationships;
- maintain adequate records to support decisions made;
- make decisions that are procedurally fair;
- foster and protect the reputation of GRNSW by not bringing GRNSW into disrepute or ridicule as a result of their actions or conduct;
- act in accordance with GRNSW's policies and procedures when becoming aware of any conduct engaged in by a GRNSW Worker or industry participant, including conduct in breach of this Code of Conduct;
- avoid behaviour which might reasonably be perceived as creating an unsafe or unhealthy working environment;
- avoid behaviour which might reasonably be perceived as corrupt, harassment, bullying or intimidation; and
- facilitate compliance and adherence to this Code of Conduct.

3. Standards Of Dress

GRNSW Employees must, when performing work for GRNSW, dress in a manner that:

- maintains respect;
- complies with relevant Work Health Safety standards;
- establishes credibility; and
- upholds the good reputation of GRNSW.

GRNSW's corporate uniforms should be taken as an indicator of this standard.

4. Conflict Of interest

A conflict of interest exists when it is likely that a GRNSW Worker could be influenced, or perceived to be influenced, by a personal interest (including that of an associate of the GRNSW Worker) in the course of or in connection with their work for GRNSW. Conflicts of interests that lead to partial or biased decision-making may constitute corrupt conduct.

A conflict of interest can arise because of an actual conflict, or because of circumstances which may lead to an impartial person being concerned that a possible conflict of interest may arise.

If any GRNSW Worker becomes aware of a conflict of interest, or circumstances in which a conflict of interest may arise, they must promptly make full disclosure of the conflict of interest, or potential for a conflict of interest to arise, in accordance with GRNSW's Conflict of Interest Policy. In addition, the GRNSW Worker must cooperate with GRNSW to ensure all appropriate steps are taken to eliminate or manage such conflicts.

5. Secondary Employment and Earnings

GRNSW Employees must not engage in any form of paid employment or work, other than their employment with GRNSW, without the prior written approval of the Chief Executive Officer of GRNSW, or the delegate of the Chief Executive Officer. This approval will not be unreasonably withheld.

All GRNSW Employees who engage in paid employment or work, other than with GRNSW, must ensure that the employment or work:

- does not interfere with or affect the performance of their work for GRNSW;
- is not carried out when they are performing work for GRNSW;
- does not give rise to an actual, reasonably perceived, or potential conflict of interest with their work for GRNSW; and
- does not involve the use of any of GRNSW's resources.

GRNSW Employees must disclose any outside employment by completing a GRNSW Employees Declaration of Interests Form.

6. Working Ethically

GRNSW Employees must not improperly influence any person to try and obtain advantage or favours. All decisions need to be, and be seen to be, fair and transparent.

Any information or advice or decision should always be consistent with relevant legislation and GRNSW's policies and procedures. GRNSW Employees are required to follow principles of procedural fairness in decision making where those decisions impact on the rights or entitlements of others. GRNSW Employees must be able to justify a particular course of action and to demonstrate that a decision is reasonable, fair and equitable in the circumstances.

To promote ethical awareness, conduct and decision-making within GRNSW, GRNSW Employees should consider the following:

- Is the decision or conduct lawful?
- Is the decision or conduct consistent with GRNSW's policies, GRNSW's values and this Code of Conduct?
- What will the outcome be for the GRNSW Worker, their colleagues, GRNSW, the greyhound racing industry and other relevant stakeholders?
- Does the outcome create a conflict of interest or lead to a private gain at the expense of greyhound racing and/or GRNSW?
- Can the decision or conduct be justified in terms of the interests of GRNSW and would it withstand the scrutiny of industry stakeholders and the general public?

GRNSW Employees must, when making decisions in the course of performing work for GRNSW:

- take into account all the relevant facts;
- take reasonable steps to obtain the necessary information to make a decision;
- be reasonably satisfied that the information is factual and correct;

- consider the merits of the case, including the consequences of any proposed action, and don't take irrelevant matters into consideration;
- ensure they make decisions in a fair and impartial manner; and
- where required keep records of decisions made.

Where the personal views of any GRNSW Employees conflict with the performance of their official duties, or they believe they cannot act impartially, they should discuss this with their manager.

7. Corrupt and Unlawful Conduct

Corrupt conduct includes any dishonest or improper use of position or information which provides, or may provide, a benefit to a GRNSW Worker or any of their associates.

Corrupt conduct also includes any action by a member of the public to influence a GRNSW Worker to act corruptly when carrying out duties.

Certain types of corrupt conduct and unlawful conduct may amount to a breach of New South Wales or Commonwealth law.

Corrupt conduct or unlawful conduct in the course of performing work for GRNSW may include, but is not limited to:

- theft or misappropriation of GRNSW's resources;
- offering or accepting bribes, commissions or secret payments;
- accepting a gift or benefit that is intended to, or is likely to, cause the GRNSW Worker to act in a particular manner;
- fraudulent or criminal conduct;
- forgery and making false or fraudulent claims;
- misuse or unauthorised disclosure of information or material owned, held or maintained by GRNSW;
- contriving, or attempting to contrive, the result of any aspect of any Greyhound Event, whether for reward or personal benefit or otherwise;
- the disclosure or provision of information about a greyhound nominated or drawn in a Greyhound Event unless such information could reasonably be deemed to be suitable for the public domain or the disclosure is authorised and reasonable in the context of the performance of the GRNSW Worker's work;
- willful or negligent damage to GRNSW's resources or those of a third party;
- unlawfully discriminatory behaviour;
- assault or other forms of unlawful violence against a person;
- possession or distribution of material likely to offend due to race, ethnic or national origin, gender identity, sexual orientation or religious belief;
- possession or distribution of illegal drugs; and
- possession or distribution of pornography.

All GRNSW Employees must promptly report any actual or suspected corrupt or unlawful conduct of which they become aware to GRNSW's Head of People, Culture and Training or GRNSW's Chief Executive Officer.

8. Acceptance Of A Gift Or Benefit

All GRNSW Employees are subject to and must comply with the provisions of GRNSW's Gift and Benefits Policy.

GRNSW Employees must not solicit nor accept gifts or benefits, either for themselves or for another person, which might in any way, either directly or indirectly, compromise or influence them in their official GRNSW capacity or might appear to do so.

GRNSW Employees may give or accept an occasional gift or benefit which is offered in accordance with social or cultural practice, subject to the following requirements:

- gifts may only be accepted if the recipient is satisfied that they cannot be compromised, or be seen as having being compromised, by doing so;
- any GRNSW Employees who are in a position in the course of their work for GRNSW to give a gift or benefit to a third party must not accept a gift from that party;
- where the value of a gift or benefit exceeds \$50 AUD, GRNSW Employees may only retain it if they complete the GRNSW Gifts and Benefits Declaration Form and it is recorded in GRNSW's Register of Gifts and Benefits; and
- cash or gift vouchers must not be accepted from any third party which derives a commercial benefit from a contractual relationship with GRNSW under any circumstances.

GRNSW Employees must report any offers or bribes to their manager or the Head of People Culture and Training, who should then ensure that the matter is reported as corrupt behaviour in accordance with this Code of Conduct.

9. Drugs and Alcohol

GRNSW is committed to providing a productive, safe and healthy workplace.

GRNSW Employees are responsible for ensuring that their capacity to exercise sound judgement and perform their work for GRNSW is not impaired by the use of alcohol or other drugs, and that the use of such substances does not put any other person's health and safety at risk.

Under no circumstances should GRNSW Employees perform work under the influence of alcohol or drugs.

GRNSW Employees must not:

- use, possess or be impaired by the effects of alcohol or illegal drugs while performing work; or
- consume alcohol while performing work or at a GRNSW premises (except at an authorised social activity).

GRNSW Employees who are prescribed medication which could impair them in the performance of their work must inform their manager to ensure any necessary precautions or adjustments to work can be put in place.

If a GRNSW Worker is required to operate a motor vehicle as part of their work, they must report to their manager or supervisor any matter that results in them ceasing to hold a current driver's licence (including suspension) due to an alcohol or drug related driving offence.

Any GRNSW Employees who feel that they may be dependent on alcohol and/or drugs is encouraged to seek external clinical assistance, or to participate in the Employee Assistance Program.

10. Access To Support and Advice

GRNSW provides a free and confidential Employee Assistance Program (**EAP**) for GRNSW Employees. The purpose of the EAP is to provide counselling, coaching and support for workplace and personal issues.

This service also assists employees who voluntarily seek help for alcohol and/or drug dependence problems. Participation by GRNSW Employees in the EAP is confidential.

11. Wagering and Gambling

GRNSW Employees must not themselves, or through any third party, wager on, or engage in any gambling activity in relation to a Greyhound Event (regardless of the location at which the Greyhound Event is held, including outside of Australia) at anytime.

GRNSW Employees must not engage in any other form of wagering or gambling activity (including but not limited to the use of gaming devices such as a mobile, phone and tablets) and wagering on a race not involving a greyhound and other sporting events:

- while at GRNSW's workplace;
- while performing work for GRNSW (regardless of whether they are being paid for the performance of that work) including meal and rest breaks; or
- using any of GRNSW's resources (including but not limited to computers, telephones and mobile telephones).

12. Protection Of Information

Under the *Government Information (Public Access) Act 2009* (NSW), GRNSW is encouraged to make certain information more accessible to the public. The public has an enforceable right to make access applications for certain types of information and access should only be restricted where there is an overriding public interest against disclosure.

However, GRNSW must also apply with other applicable laws, such as privacy laws, and must ensure the confidentiality of certain information which may impact on GRNSW's operations and functions (such as confidential investigations or surveillance activities).

GRNSW Employees must maintain the confidentiality of all official information and of any documents or other records which are not published or normally made available to the public.

Official information in any form (whether print, electronic or otherwise) may only be used for a purpose authorised by GRNSW and may only be accessed by members of GRNSW who are authorised to, and required to, access that information in the performance of their work for GRNSW.

GRNSW Employees must take all reasonable precautions to prevent the unauthorised access to, or disclosure of, official information and comply with applicable GRNSW policies, including GRNSW's Privacy Policy.

GRNSW Employees must only destroy, or authorise the destruction of, official information or other documents or records of GRNSW, in accordance with applicable policies and laws.

13. Public Comment and Political, Community or Personal Activities

GRNSW Employees are seen as ambassadors for greyhound racing in New South Wales. As a result, any public comment they make, even in their private capacity, may impact on the greyhound racing industry in New South Wales as a whole.

GRNSW Employees must not make public comments, including but not limited to on radio or television, in letters to newspapers, on websites or other social or digital networking platforms, or in any other published materials, about matters relating to greyhound.

Although GRNSW Employees have the right to participate in political or other activities, that participation must not conflict with, or influence, their work for GRNSW and the GRNSW

Employees must ensure that their participation in such activities does not, in any way, impact on GRNSW or the greyhound racing industry.

14. Work Health and Safety

GRNSW is committed to ensuring the health, safety and wellbeing of GRNSW Employees while they are undertaking work. All GRNSW Employees are responsible for ensuring a safe and healthy work environment.

GRNSW Employees must:

- comply with GRNSW's WHS policies and procedures;
- take reasonable care for their own health and safety and the health and safety of others who may be affected by their acts or omissions at work;
- co-operate with GRNSW to ensure compliance with all relevant health and safety laws;
- follow safe work practices, including using personal protective equipment when required; and
- report and hazards or near misses immediately in accordance with applicable policies and procedures.

15. Use of GRNSW Resources

GRNSW's resources (including facilities and equipment) are the property of GRNSW and are provided for GRNSW business.

GRNSW Employees must use GRNSW's resources in an efficient and economical manner and, subject to what is set out below, for legitimate purposes related to GRNSW's operations and activities.

GRNSW recognises that some reasonable personal use by GRNSW Employees of GRNSW's resources (including facilities and equipment such as telephones, tablets, computers, email and internet) is appropriate provided that such use is not excessive and does not disrupt official work and it is in accordance with this Code of Conduct and any other applicable policies or procedures of GRNSW. Such usage remains at all times at the discretion of GRNSW.

GRNSW resources must not be used for secondary or other paid employment or for the purposes of private or individual commercial business. GRNSW Employees must not use credit cards issued by GRNSW for their own personal use.

Any GRNSW Employees who are uncertain about personal usage must seek the advice of their supervisor or manager.

16. Appropriate Workplace Behaviour

GRNSW will not tolerate any form of harassment, bullying or inappropriate workplace behaviour. All GRNSW Employees have the right to enjoy an environment free of bullying and harassment.

GRNSW Employees must not discriminate against a person because of race, ethnic or national origin, sex, age, marital status, pregnancy, disability, gender identity, sexual orientation, political or religious beliefs or responsibilities as a carer. Such discrimination may be unlawful.

GRNSW Employees must not make unfounded complaints with malicious, frivolous or vexatious intent against another GRNSW Worker, stakeholder or any other person.

Any GRNSW Employees involved in any behaviour that is deemed to constitute discrimination, harassment or bullying will be subject to disciplinary action, up to and including dismissal.

All GRNSW Employees must be familiar with, and comply with, GRNSW's Appropriate Workplace Behaviour Policy.

17. Dealing With Suspended or Disqualified Industry Participants

GRNSW Employees must not associate or have any dealings or contact that extends beyond their work in a professional capacity, with any person who is suspended, or has been disqualified, under the GRNSW Greyhound Racing Rules unless this has been approved in advance and in writing by GRNSW's Chief Executive Officer

18. Ensuring GRNSW Employees' Conduct Complies with this Code of Conduct

If a GRNSW Worker is in doubt about whether a particular course of action would be consistent with this Code of Conduct, it may help to consider the following:

- Does it feel like the right thing to do?
- What would the reaction be if this was reported in the media?
- Would my manager or colleagues consider my behaviour appropriate?
- Would this impact our relationship with industry participants, government, commercial partners and/or the wider community?

A GRNSW Worker may also contact their supervisor or manager, GRNSW's Head of People Culture and Training or GRNSW's Chief Executive Officer for advice and support.

Consequences Of A Breach

If a GRNSW Worker who is employed by GRNSW breaches this Code of Conduct, they may be subject to disciplinary action, up to and including the termination of their employment with GRNSW.

If a GRNSW Worker who is not employed by GRNSW breaches this Code of Conduct, their engagement with GRNSW may be terminated, they may be prohibited from performing any further work for GRNSW or in connection with the greyhound racing industry, or both.

Where appropriate, a breach of this Code of Conduct may result in GRNSW notifying relevant authorities, agencies, or both. This may result in criminal action, fines or imprisonment.

Definitions

In this policy:

Act means the *Greyhound Racing Act 2017* (NSW)

Greyhound Event means any race or event involving greyhounds including digital and virtual greyhounds conducted for the purpose of wagering.

GRNSW Employees means anyone performing work for GRNSW, including employees (whether full time, part-time, or casual and whether employed on a temporary or ongoing basis), contractors, consultants and volunteers but excluding the directors of GRNSW.

Non-pecuniary interest means an interest that is not financial or monetary but arises from such things as personal relationships, beliefs or involvement in social, cultural, religious or sporting activities.

Pecuniary interest means an actual or potential financial gain or loss for the person, their family, friends or associates

Ownership means having a legal or equitable interest in a greyhound, including a lease, with the interest being registered/recorded with any controlling body.

Wagering means gambling, betting, wagering or speculating on events offered by a bookmaker or parimutuel entity.

WHS means work health and safety.

Relevant Legislation and Rules

- Age Discrimination Act 2004 (Cth)
- Anti-Discrimination Act 1977 (NSW)
- Australian Human Rights Commission Act 1986 (Cth)
- Crimes Act 1900 (NSW)
- Criminal Code Act 1995 (NSW) Disability Discrimination Act 1992 (Cth) Fair Work Act 2009 (Cth)
- Government Information (Public Access) Act 2009 (NSW)
- Greyhound Racing Act 2009 (NSW) Greyhound Racing Act 2017 (NSW) GRNSW Greyhound Racing Rules
- Privacy Act 1988 (Cth)
- Sex Discrimination Act 1984 (Cth)
- Work Health and Safety Act 2011 (NSW)

Key related documents

- Appropriate Workplace Behavior Policy
- Corporate Credit Card Policy
- Conflict of Interest Policy Public Comment Policy Delegations and Authorisations Policy
- Gift and Benefits Policy
- Gifts and Benefits Declaration Form Motor Vehicle Policy
- Privacy Policy
- Public Comment Policy Records Management Policy
- Staff Declaration of Interests and Secondary Employment Form Travel Policy
- Use of Corporate Credit Card Procedure Work Health and Safety Policy

Amendments To, and Operation Of, This Code of Conduct

GRNSW reserves the right to amend this Code of Conduct at any time. This Code of Conduct does not operate contractually and is not intended to be contractual in nature.

Policy Information:	
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Policy Owner	Chief Executive Officer (CEO)
Policy Reviewer	Head of People, Culture and Training
Date For Review	Annually

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1.01	5 March 2018	CEO Approval
1.02	16 April 2021	Minor edits for Board approval
1.03	19 September 2023	Review and amendments