



# Employee Code of Conduct

Issued: 1 January 2011

**Greyhound Racing NSW**  
Building B  
1 Homebush Bay Drive  
Rhodes NSW 2138

*Correspondence*  
PO Box 170  
Concord West NSW 2138

*Phone* 02 8767 0500  
*Fax* 02 9764 6244

[www.thedogs.com.au](http://www.thedogs.com.au)

---

# 1. Purpose of Code of Conduct

---

Greyhound Racing New South Wales (GRNSW) is a body corporate independent of Government established under the Greyhound Racing Act 2009 charged with the responsibility to manage, regulate and develop the greyhound racing industry in NSW.

As the peak body of the NSW greyhound racing industry, GRNSW employees have a unique obligation to act both in the interests of the greyhound racing industry as a whole and the public interest. Members of the sport have a right to expect that the business of GRNSW is conducted with efficiency, fairness, transparency, impartiality and integrity.

The purpose of this Code is to provide a framework for employees' ethical behaviour, actions and decisions. In addition, the Code provides guidance to employees to assist them in carrying out their duties and responsibilities effectively and in accordance with the highest professional standards.

The Code should function as an active guide to decision making. It sets out the standard of conduct and behaviour expected from all employees, with the particular objective of ensuring that the activities of greyhound racing in NSW inspire the utmost faith, confidence and support of all participants and stakeholders.

---

# 2. Values Underlying the Code

---

This Code of Conduct is based on a set of values that all employees of GRNSW are required to follow:

- Integrity;
- Honesty;
- Loyalty to the interests of the greyhound racing industry and the public interest in general;
- Fairness;
- Conscientiousness;
- Compassion;
- Professionalism;
- Diligence; and
- Economy and efficiency.

---

## 3. Principles of Code of Conduct

---

This Code of Conduct is prepared within a framework of principles that are fundamental to the ethos governing behaviour. The greyhound racing industry is entitled to expect that the business of GRNSW is conducted with efficiency, economy, fairness, impartiality, transparency, accountability and integrity. To meet these expectations, all GRNSW employees must adhere to the following principles whilst fulfilling their duties:

### a) Industry and Public Confidence

Participants, GRNSW business partners, punters, supporters of the sport and the public in general, have a right to expect that employees of GRNSW:

1. Are of the highest integrity and competence;
2. Treat all persons fairly, reasonably and equitably;
3. Accord them with privacy surrounding their transactions; and
4. Provide efficient and friendly service.

Employees must always act in the interests of GRNSW and not in their private interest.

Employees of GRNSW should protect the reputation and standing of GRNSW at all times. Employees should not engage in activities, either at work or outside of work, which would bring GRNSW into disrepute.

Employees' rights comprise the normal rights of employees under the common law and within the provisions of legislation.

### b) Respect for Persons

Employees of GRNSW are to treat participants, GRNSW business partners, punters, supporters of the sport, the public in general and colleagues with trust, respect, honesty, fairness, sensitivity and dignity, and with proper regard for their rights and obligations. To this end, employees should perform their duties in a professional and responsible manner ensuring that their decisions and actions are reasonable, fair and appropriate to the circumstances, based on a consideration of all the facts and supported by adequate documentation.

It is important for employees to respect different opinions and perspectives, and to manage disagreements by rational discussion. Employees must not behave towards other people in a way that could be perceived as intimidating or bullying.

Employees of GRNSW have a right to:

- Be treated with dignity and respect;
- Expect all dealings with GRNSW to be truthful and have regard to ethical propriety;
- Be given access to reasonable resources to enable the execution of their duties;

- Be provided an opportunity for ongoing personal development and training;
- Have performance appraised on a regular basis giving rise to constructive feedback;
- Have access to open channels of communication;
- Receive fair and reasonable compensation commensurate with performance, responsibility and market conditions;
- Have personal records treated in a private and confidential manner; and
- Report suspected fraud or corruption.

### **c) Responsive Service**

GRNSW strives to achieve the highest standards in service delivery. GRNSW employees are to provide professional and responsive service to participants, GRNSW business partners, punters, supporters of the sport and the public in general, providing all necessary and appropriate assistance to fulfil the GRNSW Customer Service Commitment.

Employees should provide information promptly and in an appropriate format that is easy for participants and stakeholders to understand. This information should be clear, accurate, current and complete.

### **d) Economy and Efficiency**

Employees of GRNSW should keep up-to-date with advances and changes in their area of expertise, looking for ways to improve performance and achieve higher standards of administration.

Employees should use their authority, available resources and information obtained during their employment with GRNSW for the purposes of fulfilling their work-related duties and functions only.

### **e) Honesty**

GRNSW requires all employees to be honest.

Employees of GRNSW may have access to money, information, goods and documents belonging to GRNSW, registered participants and clubs during their employment. Stealing, borrowing, misappropriating or converting these items to private use and unauthorised access to information are criminal actions and violate this Code. Any proven offence will result in dismissal and formal notification to the police.

Concealing errors and omissions, or attempting to protect fellow employees who have breached GRNSW policies, will also be viewed very seriously. Any employee who deliberately chooses to ignore or cover up the improper conduct of a colleague may be considered to have assisted in committing the offence and may be subject to disciplinary measures and/or police action.

## *Dishonest Acts*

A dishonest act is a misrepresentation, falsification, deception, concealment or false pretence made to obtain an advantage or inappropriate, improper or illegal results, whether acting alone or in concert with others. Acts that are considered to be dishonest include, but are not limited to:

- Conspiring with others, whether inside or outside GRNSW, to gain a benefit;
- Misuse or falsification of a GRNSW expense allowance;
- Unauthorised, concealed or other inappropriate use of GRNSW assets, services or other resources;
- Creation or use of false or misleading documents, records, tapes, computer data, electronic mail, voice media or information of any kind; and
- Intentional violation of the Greyhound Racing Rules and GRNSW internal controls, policies or procedures.

## **f) Diligence**

In performing their duties and responsibilities, employees should exercise proper diligence, care and attention, and should seek to achieve high standards of professionalism.

GRNSW aims to conduct its business with integrity, honesty and fairness. Employees should contribute to this aim by carrying out their duties honestly, responsibly, in a conscientious manner and to the best of their ability. As part of this, employees should:

- Adopt a responsible work ethic based on a fair days work for a fair days pay;
- Always act professionally;
- Give priority to official duties over personal activities during work time;
- Help GRNSW achieve its mission and goals by acting to improve systems and practices;
- Conduct themselves in a manner that provides participants and stakeholders with confidence and trust in the way GRNSW does business; and
- Not allow their conduct to distract others from working.

---

## 4. Guide to Ethical Decision Making

---

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

To assist in fostering a climate of ethical awareness, conduct and decision-making within GRNSW, the consideration of the following questions may provide employees with assistance when confronted by a challenging situation:

- Is the decision or conduct lawful?
- Is the decision or conduct consistent with GRNSW policy and in line with the strategic objectives of GRNSW and this Code of Conduct?
- What will the outcome be for the employee, 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 sport's expense?
- Can the decision or conduct be justified in terms of the interests of GRNSW and would it withhold the scrutiny of industry stakeholders?

---

## 5. Conflicts of Interest

---

Conflicts of interest exist when it is likely that an employee could be influenced, or it could be reasonably perceived that an employee has been influenced, by a personal interest when fulfilling their GRNSW duties and functions. Conflicts of interest that lead to partial decision making may constitute corrupt conduct.

Employees should avoid any financial, other interest or undertaking that could directly or indirectly compromise the performance of their duties. Conflicts of interest should be assessed in terms of the likelihood that employees possessing a particular interest could be influenced, or might appear to be influenced, in the performance of their duties on a particular matter.

In many cases only the individual employee will be aware of the potential for conflict. Therefore the onus is on the employee to notify the Chief Executive if a potential or actual conflict of interest arises.

Some related interests that may give rise to a conflict of interest include:

- Financial interests in a matter that GRNSW is dealing with or a employee that has friends or relatives with such an interest they are aware of;
- Personal benefits or attitudes that influence the impartiality of advice given;
- Personal relationships with GRNSW stakeholders that go beyond the level of a professional working relationship; and
- Secondary employment that compromises the integrity of the employee and GRNSW.

If an employee is uncertain whether a conflict of interest exists, the individual should discuss the related interest with the Chief Executive and attempt to resolve any conflicts of interest that may exist.

To resolve any conflicts of interest that occur, or could occur, a range of options are available depending on the significance of the conflict. These options include:

- Recording the details of the disclosure and taking no further action because the potential for conflict is minimal or can be eliminated by disclosure or effective supervision;
- The employee relinquishing the personal interest; or
- The employee transferring from the area of work or particular task where the conflict arises.

Employees should recognise the potential for conflict between their official duties and responsibilities and private friendships and associations. In order that potential conflicts may be avoided or managed, employees must:

- Not discuss confidential GRNSW business with friends and family;
- Ensure that, where racing matters are discussed with members of the industry in an official context, it is made clear that the employee is not acting on behalf of GRNSW;
- Ensure that, should any licensed person with whom the employee has a social or family relationship become the subject of an inquiry or other proceedings of GRNSW affecting that person, the employee immediately advises the Chief Executive and takes no part in any such inquiry or other proceedings; and
- Where such a licensed person has business with GRNSW in the ordinary course of their participation in the greyhound racing industry, the employee shall notify their manager and GRNSW will take steps to ensure that all administrative or other functions are carried out by other employees.

Disputes over alleged conflicts of interests may be resolved through normal grievance handling procedures.

---

## 6. Workplace Health and Safety

---

All employees must take reasonable steps to ensure their own safety, health and welfare in the workplace. Employees also have a duty of care to both fellow employees and members of the public.

All employees must:

- Perform all work safely;
- Follow safe work practices;
- Use personal protective equipment if required; and
- Report any incidents or hazards immediately.

When there is an injury at work or whilst under taking duties on behalf of GRNSW, the injured employee must:

- Seek medical attention;
- Notify GRNSW as soon as possible;
- Record their name, the date and cause of the injury in the GRNSW's Register of Injuries;
- Sign the WorkCover medical certificate, if one is required;
- Participate and cooperate with the development and implementation of an injury management plan;
- Comply with requests made by the insurance company with regard to their claim; and
- Make all efforts to return to work as soon as possible.

---

## 7. Intellectual Property

---

Employees must obtain approval before arranging to publish or disclose any articles or materials produced as part of official work duties. Any original work, invention or product contributed to in association with an employee's work remains GRNSW property. Similarly, employees must not publish or disclose any matters relating to GRNSW's intellectual property without appropriate authority. This does not stop employees from sharing information with other organisations relating to their official duties. However, employees must make sure they do not breach the confidentiality of GRNSW information or its suppliers, or compromise GRNSW's intellectual property rights.

---

## 8. Acceptance of Gifts or Benefits

---

A bribe is any offer of money, gift, service or a benefit that is offered to persuade a person to act other than according to their normal duties.

Employees of GRNSW must not allow themselves to be subjected to conduct by other persons in the greyhound racing industry or elsewhere that may adversely affect, either directly or indirectly, the honest and impartial exercise of their duties and functions as an employee of GRNSW.

Employees must avoid giving the indication that gifts, gratuities or hospitality relating to their employment with GRNSW will be accepted, either for themselves or any other person, or that these may influence the fulfilment of their duties. Employees may only accept token gifts and modest hospitality. Hospitality is modest when it is not more than what GRNSW, in similar circumstances, would provide in return to other persons or bodies.

If any gift, gratuity or hospitality other than a token kind is offered, or if an employee believes that they have been offered a bribe, full and prompt disclosure must be made to the Chief Executive.

Employees dealing with, or having access to, sensitive investigations or commercially sensitive information, should be particularly alert to inappropriate attempts to influence them.

---

## 9. Personal and Professional Behaviour

---

Employees are responsible for their own acts or omissions. At all times the actions of employees, both in and out of the workplace, should be beyond reproach. Employees need to ensure they act in a professional manner in accordance with policies, procedures, laws and regulations pertaining to their role. This includes accessing authorised information only for work-related tasks.

It is the responsibility of managers to ensure their employees understand:

- What their job is;
- How they are expected to do their job; and
- What results are expected of them.

Employees of GRNSW must perform their duties diligently, impartially and conscientiously, and to the best of their ability.

In the performance of their duties and functions, employees should:

- Keep up-to-date with advances and changes in their area of expertise;
- Comply with any relevant legislative, industrial or administrative requirements;
- Maintain adequate documentation to support any decisions made;
- Treat industry participants, colleagues and the public in general with courtesy and sensitivity to their rights;
- Aim to provide a high level of customer service;
- Provide all necessary and appropriate assistance to industry participants, stakeholders and members of the public;
- Strive to obtain value for GRNSW money spent, avoiding waste and extravagance in the use of GRNSW resources; and
- Not take or seek to take improper advantage of any official information gained in the course of employment.

When implementing GRNSW policy, employees' own values should not take precedence over those explicit or implicit in the policy. When faced with a situation where implementing a policy of GRNSW is at variance with their own views or beliefs, employees should discuss the matter with the Chief Executive.

GRNSW is committed to preventing the harassment of employees and the public. Employees should not harass or discriminate in work practices on the grounds of sex, marital status, pregnancy, age, race, ethnic or national origin, physical or intellectual impairment, sexual preference or on the basis of religion when dealing with their colleagues, participants, GRNSW business partners and the general public. All employees have a responsibility to contribute to building a workplace that tolerates differences and is free from intimidation, bullying and harassment. For further information see the GRNSW Bullying and Harassment Policy.

Managers must make sure that the workplace is free from all forms of harassment and discrimination. Managers should take all necessary steps to prevent and deal with harassment and discrimination in their particular work environment.

All employees have a duty to report to the Chief Executive or a member of the Executive any unethical behaviour, suspected or otherwise, or wrong-doing by any other employee, board member or industry participant. If an employee believes they are unable to report such behaviour to those persons they should report such behaviour to the Greyhound Industry Integrity Auditor.

---

## 10. Electronic Communication Usage

---

In day-to-day communication with participants, employees and the public, GRNSW uses advanced technology to conduct its business. Employees are provided with the opportunity to use these mediums such as telephones (including mobile and smart phones), faxes, email, and the internet. These are network resources and facilities owned or controlled by GRNSW, and in some cases are a privilege to use. They should be used to communicate effectively and efficiently and should not be abused.

Employees are responsible for their own conduct. GRNSW's communication media must not be used at anytime to offend, discriminate against or harass work colleagues or the public. This includes but is not limited to accessing, viewing, sending, storing, transmitting, creating or downloading inappropriate or offensive material.

If an employee receives inappropriate material through GRNSW's electronic network, they should immediately delete it and notify the sender to stop sending material of this nature. Employees should notify the General Manager of their business unit if this inappropriate behaviour continues.

Accidental connection to an inappropriate website on the internet should also be disconnected and reported immediately.

---

## 11. Betting on Greyhound Racing

---

Employees that are involved with the integrity regulation of the NSW greyhound racing industry are strictly forbidden from betting on greyhound racing. It is imperative for the maintenance of public confidence in the NSW greyhound racing industry that the public perceive that employees, at any level, involved with integrity regulation are not betting and therefore do not have the opportunity to influence, for their benefit, the area over which they have responsibility.

For the avoidance of doubt, employees with responsibility for stewarding and grading of greyhounds, together with employees with the responsibility for the oversight of such functions are strictly forbidden from betting on any greyhound racing event.

Other employees of GRNSW who are not directly involved in integrity regulation must not interfere in the regulatory process.

---

## 12. Dealings with Suspended or Disqualified Persons

---

Employees should not associate, or have any dealings or contact with persons under suspension or that are disqualified from the racing industry, except in relation to official GRNSW business with the express prior approval of the Chief Executive.

---

## 13. Fairness and Equity

---

Issues or cases being considered by employees should be dealt with consistently, promptly and fairly. This involves dealing with matters in accordance with approved procedures without discrimination on any grounds. There is an obligation to treat each issue reasonably and in conformity with the principles of natural justice.

When using any discretionary powers employees should ensure that they take all relevant facts into consideration, have regard to the particular merits of each case and not take irrelevant matters or circumstances into consideration.

---

## 14. Media and Public Comment

---

Media comment is primarily restricted to the Chairman or Chief Executive of GRNSW. However the Chief Operating Officer, the General Manager, Racing & Integrity, the Chief Steward and the General Manager, Brand & Public Relations, are authorised to make media comment with respect to their areas of responsibility and in accordance with directions from the Chief Executive.

Other employees should direct all media inquiries to the General Manager, Brand & Public Relations, in the first instance unless directed otherwise by the Chief Executive. Employees should not seek out or contact members of the media for the purposes of making comment or responding to media reports.

Employees of GRNSW should only disclose official information or documents acquired in the course of their employment when required to do so by law, in the course of duty, when called to give evidence before a court of law, or when proper authority has been given by the Chief Executive.

In these cases, comments made by employees should be confined to factual information and should not, as far as possible, express an opinion on official policy or practice unless required to do so by the circumstances of the particular situation.

Employees should not air personal views, anonymous or otherwise, that may be inaccurate or that may reflect adversely on GRNSW. Employees should ensure that their personal views are not interpreted as official comment.

---

## 15. Drugs and Alcohol

---

An employee's capacity to exercise sound judgement must not be impaired by the use of alcohol, drugs or other substances.

Employees must not:

- Use, possess or be impaired by the effects of illegal drugs while on duty;
- Consume alcohol while on duty or in the workplace (except at an authorised social activity); or
- Come to work impaired by the effects of alcohol or drugs.

---

## 16. Use of Facilities and Equipment

---

Employees of GRNSW should be:

1. Efficient and economical in their use and management of GRNSW resources; and
2. Scrupulous in their use of GRNSW property including motor vehicles, phones and other services.

GRNSW facilities and equipment should only be used for private purposes when express permission has been given by the Chief Executive.

---

## 17. Outside Employment

---

The prior approval of the Chief Executive is required before employees may engage in any form of paid employment outside of their official duties.

In all cases when outside employment is considered, employees should give their GRNSW employment first consideration and avoid situations that give rise to, or the appearance of, a conflict of interest.

---

## 18. Breaches of the Code of Conduct

---

Employees should be familiar with the responsibilities that are contained within this Code of Conduct. If GRNSW becomes aware that an employee has breached the code, appropriate action will be taken.

Suspected breaches will be treated individually and all relevant circumstances will be taken into account and investigated thoroughly. Depending on the severity of the breach, formal disciplinary proceedings might be taken. This action may vary from counselling, to disciplinary action including suspension or termination of the contract of employment.

Employees must immediately report any suspected or actual breach of the Code of Conduct. If a employee has concerns about whether their actions, or the actions of a fellow employee or colleague, comply with the Code of Conduct, they should raise these concerns with:

- Their immediate supervisor or another senior member in their business unit; or
- The Chief Executive.

Employees will not be disciplined for reporting in good faith a possible breach of the Code of Conduct.

---

## 19. Post Separation Employment

---

Employees of GRNSW should not use their position to obtain opportunities for future employment. Employees should not allow themselves or their work to be influenced by plans for, or offers of employment outside of GRNSW. The existence of such a scenario may indicate a conflict of interest and place the integrity of the employee and GRNSW at risk.

Former employees must not use or take advantage of confidential information, that may lead to gain or profit obtained in the course of their official duties, until it has become publicly available.

Employees of GRNSW should exercise due care in their dealings with former employees of GRNSW and ensure that they do not give them favourable treatment or access to privileged information.

---

## 20. Further Information

---

If an employee does not understand something in this Code of Conduct or if they would like to discuss the contents of the Code further, they should talk to the Chief Executive or the General Manager of their business unit. All enquiries will be treated in the strictest confidence.