

*Delivering trusted water services for a sustainable and healthy South Australia*

## Purpose

At SA Water we deliver safely and stand accountable, genuine and innovative every day. Our ethical standards ensure respect, safety, integrity and lawfulness in our dealings with the public and each other.

This procedure details the ethical standards that apply to us, as outlined in the *Code of Ethics for the South Australian Public Sector 2009*, Our Strategy and applicable SA Water Enterprise Agreement.

## Scope

This procedure applies to all our people including employees, temporary agency staff, interns and contractors.

## Definitions and Acronyms

Term	Description
<b>Confidential Information</b>	All information of a confidential nature regarding the past, current or future business interests, methodology, processes or affairs of SA Water, or any person or entity.
<b>Social Media</b>	Digital services and tools used for publishing, sharing and discussing information including but not limited to blogs, wikis, forums/boards, podcasts, social bookmarking, social networking and virtual worlds.
<b>We, Us, Our</b>	People performing work for SA Water

## Our vision

Delivering trusted water services for a sustainable and healthy South Australia.

## Our organisational behaviours

As an organisation we need to be:

- **Safe**

Being safe from injury or harm at work is not negotiable. Our services and the way we deliver them keeps our people, customers and community safe.

- **Innovative**

Being innovative and creative brings new ideas and uses existing ideas in new ways. We listen to learn, partner with others, seek diverse views, and problem solve to achieve smart solutions.

- **Trustworthy**

Being trustworthy instils confidence. Our actions match our words, and we are open, transparent and ethical.

- **Courageous**

Being courageous means considering new ways and striving for more. We are brave, bold and prepared to lead and influence.

- Agile

Being agile ensures we are responsive and quick. We actively adapt and deliver lean, efficient and effective solutions.

- Collaborative

Being collaborative produces stronger outcomes. We are united with our partners and community to bring diverse thinking as we solve problems and grow.

## Our personal behaviours

Our ethical standards are underpinned by the following successful personal behaviours:

- We adhere to the values and standards contained in this procedure and the *Code of Ethics for the South Australian Public Sector 2009* and model that behaviour as an example for others.
- We value diversity and are committed to fostering an inclusive environment in which we always treat people with respect.
- We make fair and objective decisions that are free from bias.
- We are detached from the influence of vested interests within the community and remain politically neutral in carrying out our duties.
- We always comply with all relevant legislation, industrial instruments, policies, procedures and lawful and reasonable directions, while performing our duties.
- We speak up if we see, hear or experience inappropriate, discriminatory or disrespectful behaviour.
- We conduct difficult conversations with empathy, sensitivity and a determination to resolve issues.
- We work flexibly, think innovatively and continually improve the services we provide, and how we deliver them.
- We hold ourselves accountable in everything we do and to the people we serve.

## Procedure

### Corporate Reputation

Our reputation is based on being safe, innovative, trustworthy, courageous, agile and collaborative in achieving our vision. You are expected to represent our interests in the conduct of our affairs so that your actions enhance our reputation.

### Diversity and inclusion

We define diversity as the differences we bring to work. It includes diversity of background - such as gender, cultural background/identity, sexual orientation, gender identity, disability, age, religious beliefs, education, professional discipline, industry experience, as well as diversity of thinking approaches. Valuing diversity in the workforce helps us to be representative of the diverse communities in which we operate and brings a range of perspectives and experiences to our work to deliver the highest quality service to our customers.

Inclusion is about creating a workplace culture where people feel respected, valued, trusted and safe to contribute the diversity of their lived experiences. Inclusion ensures we create a welcoming and supportive environment for all team members. This includes promoting a culture of respect, valuing diversity of background and different thinking approaches which ultimately leads to increased innovation and productivity.

We ask that you speak up and report to your people leader if you see or hear things that are not in the spirit of our commitment to diversity and inclusion.

## Fair Treatment, Anti-Discrimination and Harassment

SA Water is committed to the principles of equal employment opportunity and fair treatment of people. Candidates for employment will be assessed on the basis of their ability, behaviour and qualifications to carry out their job without regard to race, gender, religion, sexual orientation, disability, age, marital status, physical or mental disability, medical record, nationality, pregnancy, breast feeding or other carer responsibilities, social origin, association or political opinion or any other attributes protected by law.

You must not participate in behaviour which is unlawful discrimination or harassment, including sexual, physical or verbal harassment or other demeaning behaviour (bullying behaviour) against any individual or group of people. SA Water does not tolerate violence or threats of violence.

If you witness or experience discrimination, harassment, bullying, or workplace violence, please report it immediately to your people leader, people partner or contact officer.

## Work Health & Safety and Environment

We conduct our operations in compliance with applicable environmental and health and safety laws and Company standards, consistent with our Health and Safety Policy. Our highest priority is protecting the safety and health of our workforce and our community.

- We are all responsible for protecting our own health and safety at work.
- You must make sure you have completed an induction, any relevant training and feel safe performing the work you have been asked to complete.
- You are required to follow all reasonable (safe) instructions from your leader.
- You must comply with all SA Water policies, procedures and instructions in relation to work, health and safety (WHS) and the environment.

## Confidentiality

Confidential information will only be used for the purpose for which it was gathered, and you must:

- respect the privacy of others at all times
- ensure the privacy of individuals is maintained
- only disclose information in accordance with relevant legislation, industrial instruments, policies and procedures or lawful and reasonable direction
- comply with the *Freedom of Information Act 1991*
- respect the confidentiality of information gained during employment and when your employment with us has ceased.

You will not misuse confidential information in a manner that would be detrimental to us or to third parties.

## Privacy

Our Privacy Policy provides detail on your role in safeguarding information that has been entrusted to us. All our workforce including our contract partners have a role to play in ensuring openness, transparency and accountability in the management of personal information.

You must know and comply with your responsibilities under all of SA Waters privacy and data management procedures.

You may only access, collect, use, transfer, dispose of, or otherwise process personal information as permitted under SA Water data management and privacy procedures.

We must comply with all mandated obligations and directives relating to security, meeting the requirements of the *South Australian Protective Security Framework* and the *South Australian Cyber Security Framework*. The management of security risks to our infrastructure, operations, staff, visitors, information and reputation is detailed in the Protective Security Policy. The Security Procedure provides further detail relating to mandated security requirements such as displaying security access cards and reporting security incidents and suspicious activity.

## Public Comment

It's important we have consistency in our messaging and maintain a professional approach to our response to the media. We have a spokesperson policy in place that allows us to respond appropriately and a Media Relations Blueprint, which provides further guidance on working with the media and our obligations.

If you are not an authorised SA Water spokesperson, politely redirect the journalist to the Media team.

We are also required to comply with the *Code of Ethics for the South Australian Public Sector 2009*, which has clear guidelines on public comment, including the online environment and speaking engagements.

## Handling Official (and/or otherwise confidential) information

During the course of your duties, you must not:

- Access or attempt to access official information other than in connection with the performance of your duties and/or as authorised.
- Disclose official information acquired through the course of your employment other than is required by law or where appropriately authorised by SA Water.
- Misuse information gained in your official capacity, including, but not limited to:
  - Purchasing shares or other property on the basis of confidential information about the affairs of a business or of a proposed SA Water activity; or
  - Seeking to use information for personal benefit or gain or for the personal benefit or gain of another.
- Compromise the integrity and security of official information for which you are responsible.
- Release personally identifiable information without proper delegated authority to do so and in accordance with relevant legislation, industrial instruments, policy. Or lawful and reasonable direction.

## Use of Corporate Assets

The Technology Conditions of Use supports the Security Policy and summarises the general conditions of use of corporate assets and network access via digital devices.

- You must effectively and efficiently utilise resources at your disposal to minimise waste and misuse.

- Our assets must be acquired, maintained and used in accordance with manufacturer's instructions, in a safe manner to pursue and support our business activities and objectives.
- Personal use of our name or any brand name or trademark owned or associated with us, including letterhead or other stationery is prohibited.
- All equipment belonging to SA Water is not permitted for any personal use. SA Water employees who are contractually required to reside and work on site, in a property owned by SA Water, are permitted to use the equipment at that site for general maintenance of the property. These sites include those working at our Locks and Lake Victoria. Equipment is not permitted to be removed off the site.
- Incidental personal use of office equipment or supplies is permitted provided it is for non-commercial purposes, does not impact on the performance of work duties, is reasonable and limited, and complies with this Procedure and the *Code of Ethics for the South Australian Public Sector 2009*.
- Any actual or suspected loss of an asset must be reported in writing to your people leader.

## Email, Internet and Social Media Use

To ensure a work environment where all people are treated with dignity and respect, all email, social media and internet use must be consistent with our policies (including the Technology Conditions of Use):

- We provide email, social media and internet access to facilitate business communications; these must not be misused.
- All information stored, transmitted, received, or contained in these systems is our property and is subject to our access and review at any time.

## Gifts and Benefits

The acceptance of a gift or benefit during our employment has the potential to, or be perceived to, influence decision making. Generally, gifts and benefits should be respectfully declined, however there are some instances when acceptance may be appropriate.

The Gifts and Benefits Procedure provides further guidance on the acceptance, use or refusal of gifts and benefits and how they are recorded on the Gifts and Benefits Register.

## Conduct at Public or SA Water Events

During the course of our duties, we may be required to attend public and/or SA Water events. We are expected to conduct ourselves in a professional manner at all times:

- When attending any function in a professional capacity or as part of our employment, we are required to always act in a professional and courteous manner. You must not act in a manner that a reasonable person would view as bringing them, SA Water or Government into disrepute; or that is otherwise improper or inappropriate.

When participating in a SA Water organised event, regardless of whether it occurs during or outside of normal office hours, we are required to uphold behavioural standards that reflect our good standing and the requirements of our Drugs and Alcohol in the Workplace Procedure.

- The *Code of Ethics for the South Australian Public Sector 2009* requires us to treat other persons with respect and courtesy at all times.

## Conflicts of Interest

A conflict of interest is where your personal interests, financial or non-financial interests or other interests, or those of our family, friends or associates; are or may be seen to be in opposition to your duties and responsibilities as our employee. The *Code of Ethics for the South Australian Public*

Sector 2009 requires that we manage actual and perceived conflicts of interest. It is important to remember that even if there is no actual conflict of interest, if there could be a perception that a conflict of interest exists, that situation needs to be managed.

Conflicts of interest declarations ensure your personal and financial or non-financial interests do not influence or interfere while performing your duties and responsibilities. Conflict of interest declarations must be made when you are faced with a possible conflict of interest, or your situation could be perceived as a conflict of interest. Further information is contained in our Conflicts of Interest Framework and on the AquaNet - Managing a Conflict of Interest.

## Separating Corporate from Private Interests

Our personal relationships should not inappropriately or unfairly affect our decisions.

If you have the authority to select, promote, remunerate, discipline, terminate, appraise or allocate any business opportunity or SA Water resource, you will remain independent of decision making where it involves or may affect relatives, close friends and those with whom you have or have had an intimate relationship with.

As a matter of course when situations as described in this section arise, employees must complete a Declaration of Conflict of Interest Form as described in "Conflicts of Interest". Further information is contained in our Conflicts of Interest Framework and on the AquaNet - Managing a Conflict of Interest.

## Criminal Offences

The *Code of Ethics for the South Australian Public Sector 2009* requires that:

- At the earliest possible opportunity, you must advise your manager (or if unavailable, people partner) if you are charged with a criminal offence and, if admitted or proven, there would be a connection between the offending conduct and your duties, role or position and/or status.
- Reports of this nature must be in writing to your people leader or people partner and kept on your personnel file.
- You must comply with all legislation, industrial instruments, policies and procedures and lawful and reasonable directions relevant to your role and/or to the performance of your duties.

## Fraudulent or Illegal Activities

We require a high standard of integrity. At all times we will:

- Behave with integrity.
- Not engage in fraudulent, corrupt or illegal activity.
- Report inappropriate conduct that may reasonably be considered to be illegal or a breach of any Act.
- Comply with all legislation, industrial instruments, policies and procedures and lawful and reasonable directions relevant to our role and/or while performing our duties.
- Report any actual or suspected fraud, corruption and other criminal conduct, misconduct and maladministration in line with the Fraud and Corruption Framework.
- The Public Interest Disclosure Procedure provides detail on the mechanisms in place that enable us to raise disclosures confidentially and how these disclosures will be managed in accordance with the *Public Interest Disclosure Act 2018* and the *Independent Commissioner Against Corruption Act 2012*.
- *Unethical behaviour will be subject to disciplinary action up to and including termination of employment.*

## Related Links

- [Code of Ethics for the South Australian Public Sector 2009](#)
- [Drugs and Alcohol in the Workplace Procedure.](#)
- [Fair, Treatment, Anti-Discrimination and Harassment Procedure](#)
- [Freedom of Information Act 1991](#)
- [Media Relations Blueprint](#)
- [Fraud and Corruption Framework](#)
- [Independent Commission Against Corruption Act 2012](#)
- [Managing a Conflict of Interest](#)
- [Media Relations Blueprint](#)
- [Protective Security Policy](#)
- [Public Interest Disclosure Procedure](#)
- [SA Water Corporation Enterprise Agreement 2021-2024](#)
- [Technology Conditions of Use](#)
- [State Records Act 1997](#)

## Performance Indicators(s)

The success of this procedure can be measured by:

- An understanding across the organisation of our ethical standards and how we must conduct ourselves while performing our duties.

## Document Control

### Responsibilities

<b>Procedure Owner</b>	General Manager People and Safety
<b>Responsible Manager</b>	Senior Manager People Performance
<b>Approved by</b>	General Manager People and Safety

### Approver

Approver Name	Approver Role	Signature	Date
Nicola Murphy	General Manager Strategy and Science (Acting GM People & Safety)	Approval filed by BMS Support	14/08/2024

## Version History

Version	Effective Date	Author	Comments
0.1	21/05/15	Kathryn Nankervis	First draft.
1.0	10/06/15	Kathryn Nankervis	First release.
2.0	15/01/18	Julie Pennetta	Enhanced the intent of the procedure, updated the social media

			descriptors and role titles post re-alignment.
2.1	16/01/19	BMS Support	Reference to IT Conditions of Use updated.
3.0	30/09/2022	Caroline Victory	Reference to hire and loan of equipment updated. Vision and Values updated
3.1	15/09/22	BMS for Kate Gardiner	Minor change to Purpose statement Added as per Code of Ethics for SA Public Sector and Enterprise Agreement. Doc control
4.0	30/09/22	Caroline Victory	Reference to hire and loan of equipment updated. Vision and Values updated
4.1	12/10/22	Foyjun Nessa for Caroline Victory	Combined changes of version 3.1 and 4.0 Footer update and Doc control
5.0	18/07/2024	Shelley Smith	Enhanced intent of the procedure added vision, behaviours, practices, formatted, handling official information, criminal offences and relevant procedure refs.
	14/08/2024	BMS Support	QA checked, Issued