

## Purpose

Eastern Melbourne Primary Health Network (EMPHN) works with providers in the private, public and non-profit sectors to deliver a wide range of health services to the community. It is essential that we have high ethical standards in everything we do because we are funded by the public purse and because our capacity to improve health outcomes for the community starts – or could end – with the trust of our stakeholders and the wider community.

This statement addresses our stakeholders and community; explaining our ethical position, the standards we hold ourselves accountable to, and what we expect from our partners.

## Our values

EMPHN's values underpin our ethical standards:

- Working together – We foster partnerships by being inclusive and interacting as one team to achieve shared outcomes
- Courage – we are agile, flexible and innovative in leading transformational change and achieving our vision and mission
- Integrity – we speak the truth and operate with trust, respect, inclusion and professionalism

## EMPHN's Code of Conduct Policy

Our Code of Conduct sets the minimum requirements of conduct we expect of ourselves, to act transparently, carefully and with diligence to enhance stakeholder and community confidence in the integrity of EMPHN.

## What you can expect from us

EMPHN ensures its policies, procedures and practices relating to tendering, contracting, purchasing of goods and services, use of consultants and/or contractors and interaction with lobbyists are consistent with best practice and the highest standards of ethical conduct.

EMPHN will:

1. Pursue value for money
  - Achieve optimal outcomes at the lowest cost
  - Avoid waste and overspend
  - Undertake efficient, effective, economical and ethical procurement
  - Monitor and evaluate programs to gauge effectiveness and pursue continuous improvement
2. Ensure accountability and transparency
  - Identify and manage associated risks
  - Make decisions fairly, impartially and promptly
  - Maintain adequate documentation to support decisions made
  - Maintain avenues and options for our people, partners and consumers to provide feedback
  - Transparently report feedback and effectively manage responses
  - Adhere to the ISO27001 Information Security Systems Standard
  - Adhere to the ISO9001 Quality Management Systems Standard

3. Maintain legal compliance
  - Live up to our legislative and funder obligations
  - Keep up-to-date with advances in professional and ethical standards
  - Maintain the security, integrity and confidentiality of all EMPHN information
  - Maintain the security, integrity and confidentiality of our stakeholders' information
  - Protect personal information EMPHN obtains through working with stakeholders or employing our staff
4. Actively manage actual, perceived or potential conflicts of interest
  - Refraining from allowing personal political views and/or affiliations or interests influence our decisions or how we work
  - Fully disclosing private business interests or personal connections, which may lead to potential conflicts of interest
  - Taking no improper advantage of any official information gained in the course of our employment
  - Discourage gift receipt, and enter gifts received on our Gift Register
5. Manage resources effectively by:
  - Using EMPHN technical and physical resources properly, responsibly and for legitimate purposes
  - Using resources in a manner that causes no harm to EMPHN, our community or environment
  - Securing all EMPHN property against theft or fraud
  - Only maintaining relevant data and records.

## What we expect of you

We expect our stakeholders, consultants, suppliers and anyone doing business with EMPHN to:

1. Act ethically and honestly in dealings with us
  - Declare actual, perceived or potential conflicts of interest as soon as you become aware of them
  - Avoid collusive practice or offering EMPHN representatives inducements or incentives to improperly influence their decision-making
  - Work with EMPHN to prevent unethical practices in our business relationships
2. Work with us in good faith to improve health outcomes for the community
  - Act without discrimination and informed by cultural understanding
  - Provide a quality product or service, that addresses the defined need and the defined target audience
  - Deliver genuine value for money, within the agreed timeframes
3. Ensure compliance
  - Provide accurate and reliable information according to your signed contract or when required
  - Take all reasonable measures to prevent disclosure of confidential EMPHN information

- Comply with privacy legislation in relation to personal information obtained through dealings with EMPHN or work undertaken for EMPHN
- Communicate clearly and respond promptly to questions resolve issues quickly

## Consequences of unethical or corrupt behaviour

For EMPHN board members, staff and delegates, consequences can potentially include:

- Loss of office for EMPHN board members
- Disciplinary action including termination of employment
- Criminal charges

For our partners, consequences can potentially include:

- Withholding of payments, according to the contract
- Termination of contracts/orders according to the contract
- Loss of future opportunities with EMPHN
- Criminal prosecution

## Where to get help?

- To provide feedback on this statement or report a concern, you can use the feedback facility on EMPHN's website
- If you are concerned about conduct that could involve fraud, corruption, maladministration or serious and substantial waste of public funds, please contact EMPHN's Chief Executive Officer to make a formal report as outlined in EMPHN's Fraud and Corruption Prevention and Control Policy
- For the most serious concerns, you may choose to lodge a whistleblower report, via EMPHN's external reporting service [STOPLINE](#). The link is available [here](#), or on our website or intranet
  - Please read our [Whistleblower Policy](#) and refer to the Australian Securities and Investments Commission (ASIC) website prior to lodging a report
- Complaints can also be lodged externally with ASIC or the [Department of Health and Aged Care PHN Branch](#) by email: [PHNProgram.Complaints@au.ey.com](mailto:PHNProgram.Complaints@au.ey.com)
- For enquires about this statement, contact its owner: EMPHN's Executive Director, Corporate Services by email: [policies@emphn.org.au](mailto:policies@emphn.org.au)