

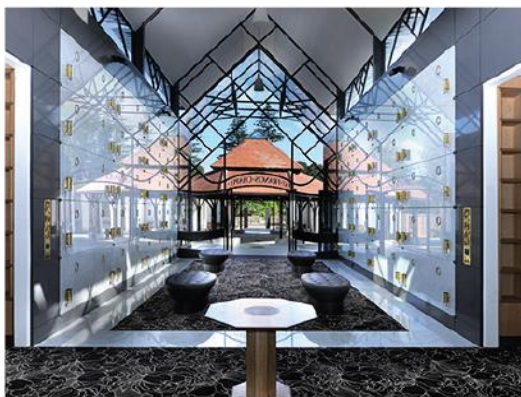


METROPOLITAN  
CEMETERIES BOARD



# CODE OF CONDUCT

*23 November 2022*



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## 1. Chief Executive Officer's message



I am committed to ensuring everyone at the Metropolitan Cemeteries Board (MCB) understands and operates with the highest level of integrity and accountability. By doing so, we can build and maintain the trust of the community we serve.

As employees of the MCB, we are entrusted to provide the Western Australian community with quality, dignified services at times when compassion, respect, understanding, and integrity are most needed.

How we conduct ourselves, as individuals and team members, impacts on how the MCB is perceived by the community and Government.

As public officers, subject to public scrutiny for our performance, we are committed to:

- Demonstrating compassion by practicing fair, transparent, and objective processes and acknowledging different opinions and perspectives.
- Showing respect for others by building a psychologically safe, and inclusive culture that celebrates our diversity and is free from all forms of discrimination.
- Undertaking our services with competence and understanding, acting in the interest of the community every day, and balancing competing expectations.
- Acting with integrity to make informed, ethical, and accountable decisions that are not influenced by our own personal or private interests or biases.

Our Code of Conduct (Code) is designed to build shared understanding of how we work together to provide the best service we can to our clients, our stakeholders and to each other. The Code provides you with guidance on what to do and how to behave as a public sector employee, reinforcing the importance of acting with a high degree of integrity, ethically and in line with professional standards. As public sector employees we are accountable to the community for our actions.

The Code is our overarching accountability framework which is supported by state and federal legislation, public sector directives and instructions, industrial awards and agreements, our policies and procedures, and our Values of Compassion, Respect, Understanding and Integrity.

The Code outlines your obligations and responsibilities and provides you with practical everyday assistance on where to look for further information and what you are to do in relation to the ethical issues you will face as an employee of the MCB and the public sector. It also provides you with guidance in preventing and reporting improper conduct, fraud, and corruption.

I am proud to lead the MCB in delivering our critically important services. I have zero tolerance for fraudulent and corrupt behaviour and expect you to act with integrity and ethics, in line with professional public service standards, not allowing yourself to be influenced by personal or private interests in the conduct of your duties.

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Please take the time to read and understand the content of this Code as your compliance is expected. By upholding the principles set out in our Code, you enhance our value to the community, enhance community trust in the public service, and demonstrate that you are a responsible public officer.

If you have any questions, please speak with your supervisor, manager, or a senior Human Resources (HR) representative.



Kathlene Oliver  
**Chief Executive Officer**

23 November 2022



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## 2. About us

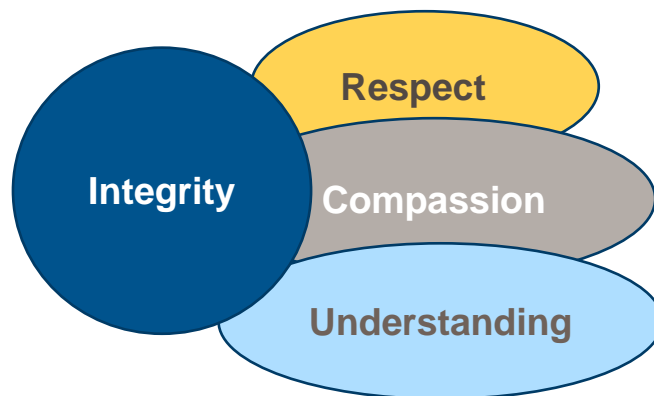
### Our Vision

Achieving excellence in the provision of quality cemetery facilities and services.

### Our Mission

A leader in cemetery management: delivering a caring and sensitive experience with burial, cremation and memorialisation services that reflect the community's values and beliefs.

### Our Values



Our values set the tone for how we go about our work. They guide our behaviour, our decisions, and our performance. How we live by our values impacts the quality of service experienced by our clients and stakeholders, and our working relationships with each other.

We demonstrate our values to our employees, clients, stakeholders and the environment through:

- Compassion
- Respect
- Understanding
- Integrity.

Our values are to be reflected in our systems and behaviours, observed when providing a service to the Western Australian community, and when interacting with fellow employees.

Our values align with the Western Australian Public Sector Code of Ethics, and our Code of Conduct.

### Substantive Equality Statement

The MCB recognises that people have different needs and must be treated differently according to their needs and cultural diversity to receive fair and equitable outcomes.



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## Access and Inclusion

This document is available in alternative formats, upon request.

## 3. A Public Sector Code of Ethics

### 3.1 Western Australian Public Sector Code of Ethics

The *Public Sector Management Act 1994* (the Act) requires the Public Sector Commissioner to establish a Code of Ethics setting out the minimum standards of conduct and integrity to be complied with by all public sector bodies and employees.

The minimum standards of conduct and integrity to be complied with are expressed in the following principles:

- **Personal Integrity** - We act with care and diligence and make decisions that are honest, fair, impartial, and timely and consider all relevant information.
- **Relationships with others** - We treat all people with respect, courtesy and sensitivity and recognise their interests, rights, safety and welfare.
- **Accountability** - We use the resources of the state in a responsible and accountable manner that ensures the efficient, effective and appropriate use of human, natural, financial and physical resources, property and information.

### 3.2 Principles of Conduct

The Code of Ethics is based upon the principles of conduct outlined in section 9 of the Act, which requires the principles of conduct that are to be observed by all public sector bodies and their employees, and they are to:

- comply with the provisions of the Act and any other Act governing their conduct
- comply with the Commissioner's Instructions, Public Sector Standards and Codes of Ethics
- comply with any Code of Conduct applicable to the public sector body or employee concerned
- act with integrity in the performance of official duties
- be scrupulous in the use of official information, equipment and facilities
- exercise proper courtesy, consideration and sensitivity in dealings with members of the public and other employees.

## 4. MCB Code of Conduct

### 4.1 The MCB Code of Conduct

The MCB Code of Conduct is based upon the principles set out in the WA Public Sector Code of Ethics, and it observes the general principles of official conduct set out in section 9 of the Act. Our Code of Conduct explains how our employees are to:

- conduct themselves when carrying out their duties
- build and maintain respectful relationships with customers, stakeholders and employees

- 
- build and sustain an ethical culture with accountable and ethical decision making, and a culture of integrity and respect within the MCB that will contribute to a positive reputation of the wider public sector.

All employees are required to read, be familiar with, and comply with our Code of Conduct. Our Code of Conduct explains:

- the legal requirement of employees to act with integrity
- the rights and responsibilities of employees to treat each other with respect
- the rights and responsibilities of employees to be treated fairly by the MCB.

Our Code of Conduct covers the following seven specific areas of conduct:

1. Personal behaviour
2. Communication and official information
3. Fraudulent or corrupt behaviour
4. Use of public resources
5. Record keeping and the use of information
6. Conflicts of interest and gifts and benefits
7. Reporting suspected breaches of the code.

## **4.2 Scope**

Our Code of Conduct sets out the expected standards of integrity and acceptable conduct and behaviour that apply to all MCB employees.

The term 'employee' collectively encompasses those who are appointed on a permanent, fixed term and casual basis; seconded from other agencies; appointed as an apprentice or trainee; individuals who have been procured under contracts for service; volunteers; and those on work experience.

## **4.3 Expected behaviour of all employees**

As public sector employees, we all have a personal responsibility to act ethically, with integrity, and to make decisions in the public interest. We represent the Government of the day and are role models for new and prospective employees, stakeholders and members of the community we serve.

As an MCB employee you must:

- treat our customers, stakeholders and employees with respect, understanding, compassion and integrity
- conduct yourself with integrity and in a manner that does not reflect adversely on the public sector, the MCB or fellow employees
- ensure you understand and comply with our Code of Conduct and our obligations as set out in our public sector accountability framework in Attachment 1
- act honestly and with integrity in the performance of your duties
- meet expected performance standards to the best of your ability
- contribute to building a harmonious, safe and productive work environment
- contribute to building and sustaining a culture of integrity, respect and ethical conduct

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- report any actual or suspected breaches of this Code, any misconduct, and any corrupt or fraudulent activity or behaviour to your supervisor, the Manager Human Resources or the CEO.

Appropriate personal behaviour in any given situation requires good judgement, guided by the applicable requirements such as those set out in government legislation, regulations, codes, standards, instructions, awards, agreements, and MCB policies, guidelines and procedures, as listed (but not limited to) in our accountability framework in Attachment 1.

#### **4.4 Expected behaviour of all supervisors and people managers**

Employees who also supervise and manage people are in a position of influence and authority. This gives them additional responsibilities when it comes to bringing our values to life. Each supervisor is expected to demonstrate leadership by modelling and promoting our values and the Code of Conduct.

In particular, all supervisors have a role to:

- exemplify integrity and our values in their actions, behaviour and decisions
- encourage dialogue on values and ethics
- maintain open and positive communication with employees
- recognise those who demonstrate our values
- challenge and coach employees who do not demonstrate our values
- report suspected breaches of the Code of Conduct, any misconduct, fraud or corruption
- respect equity and diversity in all its forms, including diversity of thought.

#### **4.5 Code of Conduct Training**

The MCB is committed to providing employees with accountable and ethical decision making training every three years, and employees are accountable to undertake that training to the MCB's satisfaction and comply with those requirements. Our Code of Conduct is covered in this training.

#### **4.6 MCB Policies**

The MCB policies form part of this Code. Many of the MCB policies are referenced in Appendix 1, along with public sector legislation, Circulars from the Premier, the Public Sector Commissioner and other relevant authorities, Public Sector Commissioner's Instructions, Treasurer's Instructions and other relevant Government policies and guidelines apply to the MCB.

The full range of MCB policies can be found on our intranet. If you are unsure of a policy's direction, please seek advice from a senior HR, Finance or ICT representative.

### **5. Consequences of breaching our Code of Conduct**

Where an employee's actions, behaviour or decisions fail to meet the standards outlined in our Code of Conduct and associated policies, the MCB may take appropriate disciplinary action. Our Disciplinary Policy states an employee commits a breach of discipline if they:

- disregard or disobey a lawful order
- contravene any provision of the Act, any Public Sector Standard or Code of Ethics
- contravene the MCB Code of Conduct



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- commit an act of misconduct
  - are negligent or careless in their performance of their functions
  - commit an act of victimisation (see Section 15 of the *Public Interest Disclosure Act 2003*).

Depending on the breach, the consequences may have serious and lasting impacts, ranging from reprimand to termination of employment.

Allegations of misconduct must be reported to the Chief Executive Officer (CEO), and may also be reported to the Public Sector Commission. Allegations of serious misconduct must be reported to the Public Sector Commission, the Corruption and Crime Commission and appropriate authorities e.g. the WA Police.

## 6. Our Code of Conduct

Our Code of Conduct is outlined in more detail under the following seven specific areas of conduct:

1. Personal behaviour
2. Communication and official information
3. Fraudulent or corrupt behaviour
4. Use of public resources
5. Record keeping and the use of information
6. Conflicts of interest and gifts and benefits
7. Reporting suspected breaches of the code.

### 6.1 Personal behaviour

#### **Act ethically and with integrity, trust and respect**

Employees are to behave in ways that engender trust and respect. They are to behave fairly, objectively, respectfully, courteously and with integrity in their dealings with the Government, our clients, the community and our employees. The powers we exercise are to be used ethically and lawfully, and without personal or private interest or influence.

#### **Impartial, competent and professional conduct**

As employees of the MCB, and public officers, we are placed in a position of trust. In carrying out our duties we may affect the welfare, rights or entitlements of members of the community. The community expects us to carry out our functions with impartiality, competence, and professionalism - showing due regard for the public interest.

#### **Improving outcomes – efficiency and innovation**

Employees are to be conscientious, effective and efficient in their work. They are to use their skills, knowledge, experience and wisdom to deliver a high-quality service, as well as identifying efficiencies and innovations to improve service outcomes.

#### **Working collaboratively with others**

Employees are expected to demonstrate appropriate personal behaviour in the workplace that supports and promotes positive working relationships. Employees are to work productively as an individual and as part of a team, and to engage collaboratively with fellow employees on work-related matters. Employees are to share information with team members to support delivery of the best and most appropriate service outcomes.

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## **Valuing and respecting diversity**

Valuing and promoting fairness, equity and diversity is an important element of demonstrating respect. The MCB strives to achieve a diverse and inclusive workforce that values diversity, equity, fairness and respect. All employees are to be treated equitably, fairly and respectfully.

The term diversity references employees who may identify with one or more groups, cultures and identities. The identified and targeted diversity groups in the Public Sector Commission's Workforce Diversification and Inclusion Strategy for the WA Public Sector Employment 2020-2025 are people from cultural and linguistically diverse backgrounds, Aboriginal and Torres Strait Islanders, women, young people, people with a disability, and people of diverse sexualities and genders.

## **Building psychologically safe and inclusive workplaces**

The MCB is committed to building psychologically safe and inclusive workplace environment where employees of diverse backgrounds feel valued, respected, safe and confident to embrace and share their ideas, ask questions, and make mistakes without fear of humiliation or retribution. Creating this environment supports genuine participation and contribution by all employees to work together to achieve our strategic goals as they feel valued and respected.

## **Creating a safe equitable workplace free from discrimination, harassment, and bullying**

Employees are to follow the spirit as well as the letter of the law in relation to creating and promoting a work environment which is free from discrimination, harassment, bullying, violence, abuse and victimisation.

Employees in managerial roles have a specific responsibility to ensure the workplace is free from all forms of unlawful discrimination, harassment and disrespectful behaviour.

## **Health, safety and wellness**

Under the *Work Health and Safety Act 2020 (WA)*, the MCB has a duty of care to provide and maintain a safe working environment. The MCB strives to create a working environment where we all accept responsibility for safety and health.

Supervisors have a responsibility to provide a workplace that is safe and healthy for all our employees and have a duty of care for employees who report to them.

All employees have a duty of care to take reasonable care to ensure their own safety and health and to avoid adversely affecting the safety and health of others. We are all responsible to ensure safe work practices are followed to promote a safe work environment through reporting, identification, assessment and control of hazards and their associated risks as far as practicable in accordance with the MCB's policies and safe working procedures.

## **Safety and personal protective equipment (PPE)**

The MCB takes all matters concerned with your health and safety seriously. As an employee you must also take all steps to ensure you are aware of your safety obligations.

Employees are to carry out their work safely and avoid conduct which puts themselves or others at risk. Employees are to report all incidents, hazards and near misses as soon as practicable.

Employees required to wear and/or use appropriate PPE must do so correctly and as required.

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## **Fitness for work – alcohol and drug free**

All employees are required to be fit for work and be free from the effects of drugs and alcohol whilst at work, to be able perform their duties safely and diligently.

The MCB is a drug and alcohol-free workplace. Employees are not to consume alcohol, illicit drugs or other substances when engaged in work-related activities. Low volume alcohol may be consumed at work related functions with the CEO's approval.

Consistent with any relevant occupational / work health and safety requirements, employees who are on medication which could affect their work performance, the safety of themselves or others, are to inform their supervisor to ensure precautions or reasonable adjustments can be put in place.

## **Smoking at work**

Smoking is prohibited in MCB vehicles, buildings, offices, within 5 meters of any building or 10 meters of any air conditioning vents or air intake ventilation ducts within the cemetery grounds.

Smoking is to be restricted to approved lunch breaks and tea breaks, and in designated smoking areas. When on duty and in uniform, MCB employees must not smoke in view of clients or members of the public.

## **Standards of dress and appearance**

Employees are expected to dress and present themselves in a professional manner which promotes the professional image of the MCB. Corporate uniform may be required for specific jobs and roles.

### **Corporate Uniform and appropriate Business Attire**

Employees who are required to wear the corporate MCB uniform, are to maintain their items of uniform in good condition, and wear only their corporate uniform when on duty.

Employees who are not required to wear the corporate uniform are required to wear appropriate business attire. If you are unsure about what constitutes an appropriate business attire dress standard, please refer to the relevant policy and initiate a conversation with your supervisor or a senior HR representative.

### **Personal telephone calls, emails and instant messaging**

On occasion employees may need to make or receive a personal telephone call or send a quick personal email or text message. Such personal communication during working times is only acceptable where some imperative exists. When it does, the employee should address the emergency swiftly with minimal disruption to their work, to other employees, and inform their supervisor.

### **Use of social media in the workplace and in work time**

Checking personal devices for messages or social media, to watch videos or YouTube, and to contact others outside the workplace during working hours is not acceptable. It is a disruption to work productivity, and a potential distraction which could impact safety. Employees are to wait until established breaks to check and use their mobile devices.

Employees are not to publish cemetery related photographs or comments on social media or in any public forum without prior approval of the CEO.

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## **Integrity checks and reporting criminal offences**

The MCB requires a satisfactory National Police Clearance check as a prerequisite for appointment to a position at the MCB.

All employees are required to ensure that during their term of employment, they report any criminal convictions or serious offences as defined by the Act. Employees are to inform their supervisor if they are charged with, or found guilty of, an offence which is punishable by imprisonment, as this could reasonably be seen to affect their ability to meet the inherent requirements of their job. These charges are also to be reported to the Manager Human Resources or the CEO.

If an employee does not disclose these matters to their supervisor, the CEO or the Manager of Human Resources, this may result in disciplinary action.

## **Ability to meet essential job requirements – licences, registrations, accreditations**

Employees are to notify the MCB of any loss, suspension, or change to a registration, accreditation, licence or other qualification which affects their ability to meet essential requirements to perform their duties. This includes a driver's licence.

## **Driving accountabilities, infringements and demerit points**

Employees authorised to drive MCB vehicles are required to obey all traffic laws, regulations and parking restrictions.

Employees are responsible for any fines or infringements incurred whilst driving a MCB vehicle and must inform their supervisor should an infringement occur while driving an MCB vehicle.

## **Driving and Parking in the Cemetery**

Employees are not to exceed the 25 kilometers an hour speed limit when driving through any of the MCB cemeteries. Employees are to park their vehicles in designated staff parking bays.

## **Conduct in Practice - Personal Behaviour**

As an employee you must:

- act ethically and with integrity
- comply with MCB and public sector policies and MCB procedures
- declare changes to essential job requirements, criminal offences, and driving offences
- ensure your professional behaviour, work performance, and working relationships are not compromised by the use of alcohol or illegal drugs either during or outside work hours
- comply with all lawful instructions
- maintain and contribute to a harmonious, productive and safe work environment
- make decisions which are ethical, fair and impartial – consider all available information
- not harass, bully or discriminate against fellow employees or members of the public
- report unacceptable behaviour to your supervisor, director or to a senior HR representative
- serve the MCB impartially, professionally, efficiently and innovatively
- take responsibility for your decisions and actions

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- treat members of the public and fellow employees with respect, and have proper regard for their interests, rights, safety and welfare.

## 6.2 Communication and official Information

### Confidentiality

Employees are to ensure they understand the importance of confidentiality. Confidential information requires special treatment and protection. Employees are to manage information in accordance with MCB's information management policies and procedures.

Employees are to ensure that information confidentiality is maintained at all times. Employees are not to use confidential information in a way that breaches confidentiality, advantages an individual or business, or disadvantages an individual, the MCB or the Government either during or post-employment with the MCB.

### Integrity and security of MCB documents and information

Employees are to ensure the integrity and security of MCB documents and information. Employees are to be careful to maintain confidentiality except where required by law or are properly authorised.

### Official information

Except in the course of official duty and with the express permission of the CEO, an employee shall not disclose confidential MCB information (PSC Administrative Instruction 711).

### Contact with lobbyists

On occasion our duties may involve contact with lobbyists. We must ensure any contact is conducted in accordance with the Public Sector Commission's contact with Lobbyists advice, and meets the public's expectations of transparency, integrity and honesty.

Lobbyists must advise of the third party they represent, the nature of the issue they are supporting, and lobbyists must be listed on the Public Sector Commission's Register of Lobbyists. For further information and guidance, please refer to the Commissioner's Instruction 16: Government Representatives Contact with Registrants and Lobbyists.

### Contact with the Minister, Public Sector Commissioner and heads of agencies

Unless in the course of official duties and with the express permission of the CEO, an employee shall not communicate with a Minister of the Crown, the Public Sector Commissioner or with a head of another government agency.

An employee who has been requested to provide information to a Minister, shall advise the CEO about the nature of the information requested and supplied (PSC Administrative Instruction 102).

### Media and public communications

The CEO will determine which employees shall be authorised to make media and public comment, and how public comment is made by those authorised employees.

Public comment includes any release of information not available on the public record, and any release of information which may spread to the wider community through views expressed on radio, television, written in newspapers, books, journals, notices and social media. It may also include information given on work computers or personal electronic devices via email or



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social networking sites, or via text messages on mobiles. All requests to provide public comment on MCB policy or related issues should be declined unless an employee has been authorised to do so.

Employees are not permitted to undermine the MCB or government administration, give their personal views on matters of government policy or administration, speculate on future policy directions, or publicly criticise any political party, its actions or its policies. Further information can be found in government directives and MCB policy.

Those employees who are authorised to give public comment are responsible for ensuring the information they express, either written or verbal is aligned with the MCB's strategic direction, policies and public communication plans (PSC Administrative Instruction 728).

### **Public sector witnesses**

On the rare occasion, an employee may be called to appear as a witness to a Parliamentary Committee, the Industrial Relations Commission, the Police or in Court proceedings. If approached, please seek direction from the Manager Human Resources.

### **Public comments by Union delegates**

Comments by employees who are union delegates may only be made on matters relating to union business.

### **Intellectual property**

Intellectual property refers to confidential information, copyrights, designs, patents and trademarks. All intellectual property developed by employees of the MCB remain the intellectual property of the MCB.

### **Conduct in Practice - Communication and Official Information**

As an employee you must:

- adhere to policies and directives regarding communication with Ministers, ministerial staff, Members of Parliament and their staff, lobbyists, parliamentary committees and members of the media
- only disclose official information within the capacity of your official duties as required by law or where proper authorisation is given
- ensure any public comment (including those made on social media) does not identify you as an employee of the MCB, and does not contain official information
- maintain appropriate security, confidentiality and privacy of all official information
- not use official information for your personal or commercial gain or for the gain or detriment of others during or post-employment with the MCB
- not publicly criticise the Government, MCB, or any employee of the MCB.

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## 6.3 Fraudulent and corrupt behaviour

The MCB is committed to high standards of integrity, honesty and accountability in all its business processes, and has a zero tolerance for misconduct, fraudulent and corrupt behaviour.

Any suspected acts of misconduct, fraud or corruption will be reported, investigated and addressed in accordance with MCB policies and procedures. This includes reporting all allegations of misconduct, fraud and corruption to the Public Sector Commission and the Corruption and Crime Commission.

Procedural fairness, natural justice and confidentiality will be maintained if an investigation is conducted.

### Public trust

Employees are to establish and sustain a high level of trust with the Government, the MCB, the community, their clients and other employees. In the performance of their public duties and in their private life, employees are to avoid conduct which may adversely affect their standing as a public officer or which may bring the MCB or the public sector into disrepute.

### Fairness

Employees are to deal with issues consistently, fairly and in a timely manner. Employees are required to consider all relevant information in dealing with MCB business. Being fair means being just and working within commonly accepted rules.

### Honesty

Employees are to act honestly in the performance of their duties. They are to be open and transparent when making decisions. They are to provide honest information based on the available facts and data. They are to ensure their information is up to date.

### Integrity

Employees are to act with integrity by being honest, ethical, respectful and transparent, making reasoned decisions without bias by following fair and objective processes and acting in the interest of the MCB and the community in their actions and decisions.

Operating with integrity means using our powers responsibly for the purpose and in the manner for which they were intended. Before making a decision or providing advice, employees are to consider all the relevant information and the impact on the Government, the MCB, the community, the clients and other employees.

Employees are to make ethical and sound decisions and provide advice which is free of prejudice, favoritism or bias, and based on sound judgement, MCB bylaws, policies and procedures. Decisions and actions are not to be influenced by personal or private interests.

Integrity is a non-negotiable to assure Western Australians that we act in the interest of the community each and every day through the decisions we make and the actions we take.

### Impartiality

Employees are to implement MCB and Government policies and programs impartially and without bias. All decisions and actions are to comply with public sector and MCB policies and are to be based on merit and a careful consideration of the relevant facts. Employees are to achieve equitable outcomes within the extent of their authority.

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## **Using powers (authority) at work**

Employees are to exercise their power and authority in a fair, reasonable, honest, ethical and responsible way. They shall not use their power to provide a benefit to themselves, their family, friends or associates.

They shall not allow family or other personal relationships to improperly influence their decisions. They shall respect the rights and dignity of those affected by their decisions and actions.

## **Fraud and corrupt behaviour**

Fraud is a dishonest activity that causes actual or potential financial loss to any person or organisation.

Corrupt behaviour is when a public sector employee uses or attempts to use their position for personal advantage or to cause detriment or advantage to others.

Employees are not to engage in any wrongdoing, misconduct, fraudulent or corrupt behaviour such as falsifying documents, records, reports, timesheets, claims, payments, or authorising fraudulent claim forms or payments, providing false or misleading information, bribery and deception. These are dismissible offences and could result in the termination of employment.

## **Misconduct**

Misconduct covers a wide range of inappropriate, unacceptable and unlawful conduct or behaviour, including breaches of discipline; a breach of trust as an employee; dishonesty; breaches of legislation, policies and the Code of Conduct; and misuse of information obtained as an employee. These will be reported to the Public Sector Commission.

## **Serious Misconduct**

Serious misconduct involves corrupt intent and / or criminal activity such as fraud, corruption or criminal conduct. These are dismissible offences and must be reported to the Corruption and Crime Commission.

## **Reporting misconduct, fraudulent and corrupt behaviour**

Employees are to comply with all legislation, policies, procedures and lawful instructions in the performance of their duties.

Employees are to report behaviour which violates any law, policy, rule or regulation, or represents misconduct, fraudulent or corrupt behaviour or conduct, mismanagement of public resources, and behaviour that is a dishonest, unethical, a danger to public health or safety, or to the environment.

The MCB informs its employees of their rights and responsibilities regarding the making of such reports.

Employees are to report misconduct, fraudulent and corrupt behavior to a senior manager, a senior HR representative, or to a PID Officer, being the Manager Human Resources and the CEO.

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## Conduct in Practice - Fraudulent and Corrupt Behaviour

As an employee you must:

- behave in ways that engender confidence and trust;
- not engage in wrongdoing, misconduct, fraud or corrupt behaviour; and
- immediately report any fraudulent or corrupt behaviour and breaches of our Code.

## 6.4 Use of Public Resources

### MCB resources

Employees are to use MCB resources and equipment responsibly, efficiently, and only for authorised work purposes. MCB resources include physical (eg. tools, equipment, paper, vehicles), financial, technological, work time and intellectual property.

### Hospitality

The MCB recognises that from time to time in the conduct of normal business, there is a need for employees to provide hospitality to business associates, clients and/or visiting dignitaries. The spending of public funds on hospitality and entertainment must always be done with care and appropriate authorisation.

Employees are to obtain appropriate approvals prior to planning hospitality events and must comply with relevant public sector and MCB policy on hospitality.

### Purchasing (corporate credit) cards

Corporate credit cards are issued for the purchase of goods and services associated with MCB business only. The MCB policy outlines the types of purchases that can be procured using a corporate credit card and requirements relating to acquittals and supporting documentation. All purchases must be made in accordance with MCB policies.

Employees who are responsible for handling or managing finances must act responsibly and with diligence and honesty. Penalties may occur under the *Financial Management Act 2006* and other Acts for unlawful conduct involving misuse of public monies. Disciplinary action may also be taken.

### Official Travel

Employees must obtain appropriate written approval according to Financial Delegations and Public Sector and MCB policy before committing to undertake official travel. Employees are required to use a corporate credit card for all expenses incurred while on official travel and business. However, where this is not possible, employees are to discuss alternative options with their supervisor.

### Value for money

Employees shall work to achieve value for money and use resources in the most effective way possible. Employees have a role to identify opportunities for improvement to achieve the best possible efficiency and responsiveness outcomes.

### MCB vehicles

MCB vehicles are to be used for MCB business purposes only, and in accordance with the Department of Finance WA Government Fleet Policy and Guidelines. MCB vehicles are not to be used for unauthorised personal business or errands.

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Employees who operate MCB vehicles are to take due care for themselves, others and the vehicle. Vehicles may only be driven by authorised drivers with a valid driver's licence.

### **Use of email, internet and social networking sites**

Access to the internet and email facilities is provided to employees for work-related tasks. Limited personal access of these facilities is acceptable in your own time provided that the facilities are used ethically and lawfully, no illegal material is browsed, and no material is downloaded.

Access to social networking sites (for example Facebook and Twitter) on MCB computers and devices is not permitted for personal use. However, employees may be granted approval if they are authorised to access these sites for work-related purposes. The MCB reserves the right to monitor and access an employee's email and internet usage if there is a suspicion of misuse.

### **Conduct in Practice - Use of Public Resources**

As an employee you must:

- be accountable for official expenditure;
- comply with MCB and public sector policies relevant to the use of public resources;
- make ethical and lawful decisions in the procurement and disposal of goods and services;
- not use public resources for party political purposes, or for commercial or personal/private financial gain;
- not use the internet, email, social media for personal use during work time;
- safeguard MCB resources while undertaking official duties and ensure all reasonable precautions are taken to prevent loss, damage, liability or use by unauthorised persons;
- use all public resources (including computers, telephones and other office equipment, vehicles, building facilities and work time) efficiently and effectively and for work purposes; and
- use corporate credit cards only for authorised MCB work-related purposes.

## **6.5 Recordkeeping and use of information**

### **Records**

Employees are responsible for creating, accessing, storing, using and disposing of government records in accordance with the *State Records Act 2000* and MCB policy.

Records are physical or electronic material which contain corporate memory and material created or received in the course of official business.

MCB records are to be accurate, complete, based on defensible evidence and not include personal, subjective or inappropriate comments.

### **Records management**

All records are to be recorded on MCB approved databases. Records are to provide a clear audit trail of how decisions are made.



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## **Records of attendance and hours worked**

All employees are required to keep an accurate record of actual hours worked on their timesheet. This includes an accurate record of any overtime hours worked or additional hours worked. Falsifying a timesheet is a serious fraudulent offence, and may result in disciplinary action, which could include termination of employment.

## **Record of absences from work**

Employees are to ensure that appropriate notice is given to their supervisor, and authorisation obtained, for any absences from work. Employees are responsible for informing their supervisor as soon as possible of any planned and unplanned absences from work.

The employee must submit a formal application for approved leave as soon as possible for all absences during core working hours. A formal application for leave is not required for approved late starts or early finishes of less than 2 hours if accrued flexi hours are available to be used, provided the actual hours worked are recorded on the employee's timesheet.

## **Freedom of Information (FOI)**

The *Freedom of Information Act 1992* creates a right for members of the public to access documents and information held by Government agencies and the MCB which are not normally available.

Hand-written notes and documents created on employee's computers, and documents and information sent or received, may be accessible to the public under FOI.

Employees are to ensure all records are appropriately recorded, and any FOI requests are handled in accordance with the FOI Act.

## **Release of information**

Only authorised employees are permitted to release information within and outside of the FOI process. The release of information is to be done in accordance with MCB policy and guidelines.

## **Conduct in Practice - Recordkeeping and use of information**

As an employee you must:

- comply with the MCB policy in regard to record creation, retention and disposal;
- ensure MCB information is accurate, complete and appropriately filed;
- ensure the secure storage of sensitive and confidential information, in both paper and electronic forms, within and outside MCB buildings;
- not access MCB information without a legitimate work-related purpose;
- not disclose information on official documents to unauthorised persons;
- not falsify, destroy, alter or damage public records or back-date information;
- accurately record actual hours worked on timesheets, and submit leave application forms for all leave taken (other than up to two hours if accrued flexi hours are being used);
- properly record official actions, decisions and work practices; and
- understand how and when information may be released.

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## 6.6 Conflicts of interest, gift and benefits

### Conflicts of interest

The community and our stakeholders have a right to expect employees will carry out their work with integrity and impartiality. Employees must not allow their personal interests to influence their work-related actions and decisions.

A conflict of interest arises when there is a conflict between an employee's public duty and their private interests. A conflict may be real, perceived to exist or have the potential to exist in the future. Private interests also include the interests of other people such as family members, friends and associates.

Situations in which a conflict of interest may arise include:

- allocating contracts for service, engagement or employment
- being offered gifts, benefits and hospitality by contractors or suppliers
- managing procurement processes
- undertaking secondary employment
- selecting individuals for employment or higher remuneration
- having personal relationships in the workplace
- wearing two hats – dual roles as a public officer.

### Identify, declare, register and manage conflicts of interest

Employees have a responsibility to maintain alertness for any real, perceived or potential conflicts of interest, and to identify, assess, declare, register, and appropriately manage them.

Conflicts of interest are to be declared using a Conflict of Interest Declaration Form and recorded in the MCB Conflict of Interest register which is maintained by Human Resources.

It is not always possible to avoid conflicts of interest. Where a real, perceived or potential conflict of interest is identified, employees are to assess and declare the conflict and work with their supervisor to identify the extent of the conflict and the best way to manage it. Undeclared conflicts of interest could be perceived as, or lead to a bias in decision making, bribery or corruption.

Employees will be required to make an annual declaration in relation to any conflict of interest.

### The six 'P's and the six R's

The six 'P's are a valuable tool to assist employees to determine if a conflict exists:

- The six P's are:
  - Public duty verses private interest
  - Potentialities
  - Perception
  - Proportionality
  - Presence of mind
  - Promises.

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The six 'R's are helpful in identifying strategies to manage conflicts of interest:

- The six R's are:
  - Record/Register
  - Restrict
  - Recruit
  - Remove
  - Relinquish
  - Resign.

These are described in more detail in the MCB's Conflict of Interest policy.

### **Consequences of not registering and managing conflicts of interest**

It is not always possible for employees to avoid a conflict of interest. However, it is important that conflicts of interest are identified, assessed, declared, registered and managed appropriately. Failure to declare, register or manage a conflict of interest may result in nepotism or patronage in decisions or actions, bribery or corruption, and disciplinary action being taken by the MCB.

### **Gifts and benefits**

Employees must not solicit, seek or accept gifts or benefits, including hospitality, commission, fees, reward, gratuity or additional remuneration for themselves or for others from customers, suppliers, contractors or stakeholders for the performance of their public duty with the MCB. Acceptance of such gifts or benefits could lead to a conflict of interest and/or allegations of bribery, corruption or unethical decision making.

Consider the GIFT test:

- **G**ift – who is offering the gift and what is their relationship to you?
- **I**nfluence – are they seeking to influence your actions or decisions?
- **F**avour – are they seeking or expecting a favour in return?
- **T**rust – would accepting the gift diminish the trust place in you? What would others think?

Employees must decline or refuse all offers of gifts and benefits that could reasonably be perceived as influencing them or undermining their integrity or that of the MCB.

Employees are to comply with MCB policies in relation to accepting, declaring and recording the offer and receipt of gifts and benefits. If you are unsure about how to respond to an offer of a gift or benefit, please seek advice from your supervisor or a senior HR representative.

All gifts and benefits offered to employees in the course of their work with the MCB, even if declined, must be recorded on the MCB Gift Register which is managed by Human Resources. This register is used to monitor who is offering our employees gifts and benefits, and potentially seeking special treatment or to create a sense of obligation from those employees.

### **Secondary employment**

In accordance with the provisions of section 102 of the PSM Act, employees are required to obtain written permission from the CEO before engaging in any form of paid employment outside their official duties with the MCB. This includes (but is not limited to) employment with any government; local government; commercial business with any corporation, company, firm

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or individual; private practice of any profession; self-employment, partnerships, family business, and community groups.

Employment includes a second job, conducting a business, trade or profession, or active involvement with other organisations, whether paid or unpaid. Managers and supervisors can assist employees to determine if such activities will cause an actual or perceived conflict of interest.

Secondary employment with the Defence Force and State Emergency Services is acceptable. However formal notification and CEO approval is required, especially if there is the potential for this service to affect the employee's attendance or job performance with the MCB; if it will or may require taking time off work for this purpose; or if there is any real, perceived or potential conflict of interest.

Employees need to ensure that their engagement in secondary employment does not create a conflict of interest with their role as an MCB employee and as a public officer, impact upon their ability to satisfactorily perform the duties of their job, or adversely affect their work attendance or the reputation of the MCB. If there is a real, perceived or potential conflict of interest, you will need to identify your strategy for managing this conflict on your application for approval.

### **Volunteer Services**

Employees are encouraged to participate in voluntary services within the community provided these services are in the employees own time; there is no financial reward; no conflict of interest with their MCB employment or duties; and no impact on their attendance, working hours or job performance with the MCB, or the reputation of the MCB. If there is any potential for a real, perceived or potential conflict of interest with your employment with the MCB, this voluntary service must be declared together with your strategy for managing this conflict of interest, and written approval obtained from the CEO.

### **Business cards**

Employees are to refrain from handing out MCB business cards in situations which are not business-related. If handing out business cards outside of normal hours, employees must be careful to not give the impression that the services are available in a private capacity.

### **Conduct in Practice - Conflicts of interest and gift and benefits**

As an employee you must:

- be alert to matters which could result in actual, perceived or potential conflicts of interest;
- declare all gifts, benefits and hospitality offered using MCB reporting processes;
- identify, declare and appropriately manage any conflict of interest;
- not engage in political or any other activities which may conflict with official duties and responsibilities as an employee / public officer; and
- seek permission from the CEO before undertaking secondary employment.

## **6.7 Reporting suspected breaches of the Code**

The reporting of suspected breaches of the Code of Conduct and any suspected or actual wrongdoing by public sector employees contributes to the integrity of the public sector. Every employee has an obligation to immediately report suspected breaches of the Code. Reports

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of suspected breaches of the Code by employees will be treated seriously, investigated, and appropriate action will be taken.

### **Information and advice**

If you have any concerns about whether your action (or the actions of a fellow employee) meets our Code of Conduct, please initiate a discussion with your supervisor or a senior HR representative.

### **Confidentiality**

Any reports of suspected breaches of the Code within the MCB will be taken seriously, treated confidentially and considered in a timely manner. For some matters you may wish to discuss your concerns confidentially with one of the MCB's Public Interest Disclosure Officers, being the Manager Human Resources and the CEO.

### **Making a complaint of discrimination or harassment**

A person who believes they have been discriminated against or harassed can lodge a complaint with their supervisor, a senior HR representative or the Equal Opportunity Commissioner. A complaint must be based on a specific ground of unlawful discrimination covered by the *Equal Employment Opportunity Act 1984*. The onus of proof lies with the person making the complaint.

### **Reporting fraud, corruption, and misconduct**

It is everyone's business to report and act against corruption. Anyone can, and is encouraged to, report any reasonable suspicion of fraud, corruption and misconduct to a senior manager, a senior HR representative, or the CEO, and provide any information that may be of assistance in an investigation. Every allegation received is taken seriously and is formally assessed and, if warranted, investigated.

If you have a reasonable suspicion that serious misconduct or corruption is taking place within the MCB, please make a confidential report of the allegation to a senior HR representative, the CEO, a Public Interest Disclosure (PID) Officer, the Public Sector Commission or the Corruption and Crime Commission.

### **Public Interest Disclosure and whistle-blower protection**

A public interest disclosure is a report of wrong doing made under the *Public Interest Disclosures Act 2003*. A disclosure must relate to a matter of public interest information by a public authority or a public sector employee or contractor performing a public function.

Employees are required to report their suspicions of wrongdoing, including misconduct, fraud, corrupt conduct, mal-administration or serious and substantial waste to a Public Interest Disclosure (PID) Officer. The MCB PID Officers are the CEO and the Manager Human Resources.

An employee who makes an appropriate disclosure of public interest to a proper authority, may be subject to whistle-blower protection offered by the *Public Interest Disclosures Act 2003*.

### **Victimisation**

Victimisation of anyone who has made a complaint or intends to make a complaint, and anyone giving evidence about a complaint on behalf of another person is unlawful and will not be tolerated. Victimisation includes threatening, harassing or punishing a person in any way because they have objected about the discriminatory manner in which they have been treated.



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## **Conduct in Practice - Reporting suspected breaches of the Code**

As an employee you must:

- take individual responsibility for upholding and implementing this Code;
- handle complaints and grievances fairly and confidentially;
- take responsibility for promptly reporting suspected breaches of this Code in a manner that is without bias or malice;
- have reasonable grounds for suspecting misconduct or breaches of this Code;
- not make false, frivolous or vexatious allegations; and
- not victimise any other person who has made a complaint, intends to make a complaint, or gives evidence about a complaint.

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## 7. Appendix 1: MCB Accountability Framework

### Metropolitan Cemeteries Board policy and related procedures

- Accountability Ethical Decision Making Training
- Alcohol and Drugs Policy
- Audio Devices Policy
- Code of Conduct
- Confidentiality and Conflict of Interest Annual Declaration Form
- Confidentiality Policy
- Conflict of Interest Assessment Form
- Conflict of Interest Policy
- Conflict of Interest Policy and Annual Declaration
- Contracting Procedures
- Corporate Credit Card Procedures Manual
- Corporate Uniform and Business Attire Policy
- Customer Service Charter
- Delegation of Authority Policy
- Disability Access and Inclusion Policy
- Discipline Policy
- Discrimination, Harassment, and Inappropriate Behaviour Policy
- Document Security Policy
- Electronic Record Policy
- Employee Assistance Program
- Equal Employment Opportunity Policy
- Fraud and Corruption Control Plan
- Filming a Funeral for Private Use Policy
- Filming in a Cemetery Policy
- Financial Management Manual
- Financial Management Manual Policy
- Gift Decision Policy and Guidelines
- Grievance Resolution Policy
- Health and Wellbeing Policy
- Honouring Indigenous War Graves Policy
- Hospitality/Entertainment Expenses Policy
- Information Security Policy
- Internet and Email Use Policy
- Managing Misconduct Policy
- Media Management Policy
- National Police Clearance Policy
- Occupational Safety and Health Policy
- Prevention of Bullying, Violence and Aggression Policy
- Printer Policy
- Procurement Policy
- Provision and Use of Mobile Phones Policy
- Public Interest Disclosure Policy and Procedures
- Purchasing Authorisation Limits

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- Purchasing Card Policy
  - Purchasing Procedures
  - Records Management Policy
  - Recruitment and Selection Policy
  - Relationships in the Workplace Policy
  - Reward and Recognition Policy
  - Risk Management Framework
  - Risk Management Fraud and Integrity Policy
  - Secondary Employment Policy
  - Secure Cash Banking Collection Procedure
  - Social Media Policy
  - Software Compliance Policy
  - Succession Planning Policy
  - Workplace Related Social Functions Policy

#### Public Sector legislation

- *Australian Constitution (Cwth)*
  - Section 44: Disqualification, officers of the crown standing for federal elections
- *Cemeteries Act 1986 (WA)*
- *Corruption, Crime and Misconduct Act 2003 (WA)*
  - Section 25: Any person may report misconduct
  - Section 28: Certain officers obliged to notify misconduct
  - Section 45(h): Certain officers obliged to notify minor misconduct
- *Criminal Code Act Compilation Act 1913 (WA)*
  - Chapter XII: Corruption and abuse of office
  - Chapter XII: Disclosing official secrets
  - Chapter XII: Corruption and Abuse of Office
  - Section 82: Bribery of public officer
  - Section 83: Corruption
  - Section 85: Falsification of records by an officer
  - Section 88: Bargaining for public office
- *Disability Services Act 1993 (WA)*
- *Electoral Act 1907 (WA)*
- *Electoral Regulations 1996 (WA)*
  - Section 28(3): Public employees standing for election
- *Environmental Protection Act 1993 (WA)*
- *Equal Opportunity Act 1984 (WA)*
- *Evidence Act 1906 (WA)*
- *Financial Management Act 2006 (WA)*

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- Section 49: Liability of officers for loss of official money or property
  - Section 81: no action is taken or omitted to prevent the provision of information by the Minister to Parliament concerning conduct or operations
  - *Freedom of Information Act 1992 (WA)*
  - *Industrial Relations Act 1979 (WA)*
    - Section 49(d): Keeping of employment records
  - *Library Board of Western Australia Act 1951 (WA)*
  - *Occupational Safety and Health Act 1984 (WA)*
  - *Public Interest Disclosure Act 2003 (WA)*
  - *Public Sector Management Act 1994 (WA)*
    - Section 7: Public administration and management principles
    - Section 8: Human resource management principles – for certain matters the department or organisation is not subject to the direction of a Minister
    - Section 9: Principles of conduct by public sector bodies – act with integrity in the performance of official duties and are to be scrupulous in the use of official information, equipment and facilities
    - Section 9(a): Comply with the provisions of any code of conduct applicable to the public sector body or employee concerned
    - Section 21(1)(d) and (e): Public Sector Commissioner to assist public sector bodies to comply with codes of conduct, and to monitor compliance with the principles in section 9
    - Section 74: Relationship between ministerial officers etc. and employees of departments
    - Section 102: Employees not to be employed outside Government etc. without permission
    - Section 105: members of Parliament not to contact employing authorities about some appointments
  - *Public Service Regulations 1988 (WA)*
    - Regulation 8: Public Comment
    - Regulation 25: Personnel records prescribed
  - *State Records Act 2000 (WA)*
    - Part 3: Record Keeping Plans
  - *State Supply Commission Act 1991 (WA)*
  - *Statutory Corporations (Liability of Directors) Act 1996 (WA)*
  - *Tobacco Products Control Act 2006 (WA)*
  - *Work Health and Safety Act 2020 (WA)*
  - *Working with Children (Criminal Record Checking) Act 2004*

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## Public Sector Industrial Requirements

- Industrial Agreement: MCB (WA) Cemetery Employees Industrial Agreement
- Industrial Agreement: Public Sector (CSA) Agreement
- Industrial Award: Government Officers Salaries and Conditions (GOSAC) Award

## Public Sector Commission Requirements

- Administrative Instruction 102: Official communications – Unless in the course of official duties or with the express permission of the chief executive officer, an officer shall not communicate with a Minister of the Crown, the Commissioner or with the chief executive officer of another department. The Minister administering a department may request an officer of that department to provide information on any official matter. An officer who has been requested to provide information to the Minister, shall then advise the chief executive officer about the nature of the information supplied
- Administrative Instruction 711: Official information – An officer shall not, except in the course of the officer's official duty and with the express permission of the chief executive officer, disclose certain information
- Administrative Instruction 728: Media and public communications – Chief executive officers will determine which officers shall be authorised to make public comment. Explains how public comment is made by authorised officers
- Approved Procedure 5 - Approved Contractors for Services Procedures 2009
- Commissioner's Instruction No. 7 – Code of Ethics – Outlines the minimum standards of conduct and integrity to be complied with by all public sector bodies and employees
- Commissioner's Instruction No. 8 – Codes of conduct and integrity training - Requires all public sector agencies to have a code of conduct and ensure Accountable and Ethical Decision Making Training is provided to all employees.
- Commissioner's Instruction No.16 - Government representatives contact with registrants and lobbyists – To outline the obligations on government representatives when dealing with registrants and lobbyists, in accordance with the Integrity (Lobbyists) Act 2016.
- Public Sector Standards in Human Resource Management – Outline the minimum standards of merit, equity and probity to be complied with in the public sector for a number of human resource activities
- Public Sector Commissioner's Circular: 2019-01 Participation of public sector employees and officeholders in Federal and State elections and by elections
- Public Sector Commissioner's Circular: 2018-03 Code of Practice: Occupational safety and health in the Western Australian public sector – Promotes strategies to help CEOs, managers and employees improve the work environment and ensure compliance with the *Occupational Safety and Health Act 1984*
- Public Sector Commissioner's Circular: 2018-02 Measures to achieve equality in human resource management
- Public Sector Commissioner's Circular: 2015-01 Implementation of the policy framework for substantive equality – Aims to eliminate systemic racial discrimination in public sector services and promote sensitivity to different client groups
- Public Sector Commissioner's Circular: 2014-02 Policy framework and standards for information sharing between government agencies

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- Public Sector Commissioner's Circular: 2013-04 Equal employment opportunity management plans and workforce planning in the public sector – Public sector bodies are required to prepare and implement an equal employment opportunity management plan Conduct guide – Developing a code of conduct Personal behaviour 13
  - Public Sector Commissioner's Circular: 2012-02 Self-managed superannuation funds (SMSF) – Outside Employment – Treated as outside employment under section 102 of the *Public Sector Management Act 1994*
  - Public Sector Commissioner's Circular: 2010-05 Computer Information and Internet Security
  - Public Sector Commissioner's Circular: 2009-18 Guidelines for Official expenditure on Hospitality – Expenditure on hospitality is to be consistent with responsibilities of public sector officers. All officers are to be scrupulous in their use of public funds.
  - Public Sector Commissioner's Circular: 2009-16 Guidelines for Successful Partnerships between public sector agencies and volunteers
  - Public Sector Commissioner's Circular: 2009-15 Information for Ministers, ministerial staff and public sector employees called as witnesses before the Corruption and Crime Commission – Guidelines for reimbursement of legal costs incurred by eligible witnesses, where appropriate
  - Public Sector Commissioner's Circular: 2009-10 Communication arrangements between Ministers and agencies – section 74 of the *Public Sector Management Act 1994* – Outlines Ministers' responsibilities for how communications are made between ministerial staff and government employees
  - Public Sector Commissioner's Circular: 2009-27 Complaints management – Public sector bodies' complaints management systems must conform to Australian Standard ISO 10002-2006
  - Public Sector Commissioner's Circular: 2009-29 Policy framework and standards for information sharing between government agencies – Facilitates the structures for sharing information
  - Public Sector Commissioner's Circular: 2009-30 Government intellectual property policy – Outlines the protection, management, use and commercialisation of intellectual property

### Premier's Circulars

- Premier's Circular: 2019/07 State Government Boards and Committees – Outlines payment of fees to government officers
- Premier's Circular: 2019/05 Cabinet Confidentiality
- Premier's Circular: 2019/02 Delivering Community Services in Partnership Policy
- Premier's Circular: 2019/01 Requirements for Western Australian Government publications and library collections – Outlines requirements to lodge publications with state and national libraries
- Premier's Circular: 2018/05 Permanent engagement of fixed term contract and casual employees
- Premier's Circular: 2018/01 Government office accommodation policy – Establishes a framework to achieve value-for-money office accommodation that supports agencies' service delivery requirements.



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- Premier's Circular: 2017/07 Family and domestic violence, paid leave and workplace support
  - Premier's Circular: 2017/04 Review of payment of all existing attraction and retention benefits
  - Premier's Circular: 2017/03 Coordination and governance of public sector labour relations – Requires public sector bodies to comply with the Coordination and Governance framework for Public Sector Labour Relations
  - Premier's Circular: 2017/02 Advertising and communications expenditure
  - Premier's Circular: 2014/03 Government advertising and communications policy – Outlines the requirements for campaign and non-campaign advertising
  - Premier's Circular: 2014/02 Guidelines for official air travel by Ministers, Parliamentary Secretaries and Government Officers – Provides guidance for official air travel arrangements, including information regarding frequent flyer programs
  - Premier's Circular: 2009/05 Registration of CCTV systems

#### The Integrity Coordinating Group [www.icg.wa.gov.au](http://www.icg.wa.gov.au)

- Conflicts of interest - guidelines and scenarios
- Gifts, benefits and hospitality - A guide to good practice
- Integrity in decision making - info sheets and checklists
- Taking action on integrity issues – a guide for public officers

#### Finance legislation

- *Procurement Act 2020* (WA)

#### Treasurer's Instructions

These outline financial administration requirements for accounting for revenue, expenditure and property, and the standards for reporting.

- Treasurer's Instruction 304: Authorisation of Payments
- Treasurer's Instruction 321: Credit cards – Authorised Use
- Treasurer's Instruction 406: Custody of Public Property
- Treasurer's Instruction 411: Motor Vehicles
- Treasurer's Instruction 803: Shortages and Surpluses of Money – an appropriate level of control is necessary to ensure probity, to safeguard money and maintain accurate and consistent accounting records.

Treasurer's Instruction 825: Risk Management and Security – Managers need to focus on material risks at all levels of the organisation and take necessary actions to manage those risks, including human behaviour, safeguarding assets from misuse and loss due to theft or damage, and protect the agency, Government and the community from unnecessary costs and losses.

#### Other Government requirements

- Western Australian Government Fleet Policy and Guidelines ([www.finance.wa.gov.au](http://www.finance.wa.gov.au))
- Western Australian Government Purchasing Card Guidelines (corporate credit card) ([www.finance.wa.gov.au](http://www.finance.wa.gov.au))
- Whole of Government Contracts ([www.contractswa.finance.wa.gov.au](http://www.contractswa.finance.wa.gov.au))

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## More information

Metropolitan Cemeteries Board

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Telephone: 1300 793 109

[National Relay Service](#) 133 677 (voice calls), 1300 555 727 (Speak & Listen), 0423 677 767 (SMS Relay)

Website: <http://www.mcb.wa.gov.au>

## Acknowledgement

The MCB acknowledges the contribution of the Public Sector Commission (Western Australia) Conduct Guide for material quoted or reproduced in this document.

## Review Process and Document Control

This Code will be reviewed every four years or when determined necessary to ensure the Code meets the needs of the Metropolitan Cemeteries Board.

Current from	30 November 2022
Replaces	Version – July 2021
For review	November 2023 (for upcoming changes to Government Circulars)
Officer responsible	Manager Human Resources