



RCTC-P012_25 CODE OF CONDUCT POLICY

1.0 OBJECTIVE

- 1.1 The objective of this Code of Conduct Policy (the 'Code') is to outline the standards of conduct in professional and personal behaviour that the Catholic Diocese of Townsville ('Diocese') expects of its personnel to achieve a safe, supportive, productive and harmonious workplace and to uphold the values, integrity and reputation of the Diocese.

2.0 SCOPE

- 2.1 This Code applies to all Church personnel of the Diocese, who are working for the Agencies, Ministries and Parishes under the jurisdiction of the Bishop of Townsville. Church personnel describes a cleric, member of a religious institute or other person (other than a cleric or a member of a religious institute) who is employed by the Roman Catholic Trust Corporation for the Diocese of Townsville or engaged on a contract, subcontract, voluntary or unpaid basis.¹
- 2.2 The Code outlines the obligations, responsibilities and standard of behaviour the Diocese requires of all personnel.
- 2.3 Personnel are to make themselves familiar with the requirements of this document and ensure they comply with the behaviours and obligations outlined within it.
- 2.4 Failure to comply with the responsibilities and obligations outlined in the Code may result in disciplinary action being taken, including termination of employment, termination of volunteering agreement, notification to external agencies and/or criminal charges.
- 2.5 Certain sections of the Code reflect the requirements of legislation, and breaches of these conditions may be punishable under law.

3.0 POLICY STATEMENT

- 3.1 The Diocese affirms its commitment to upholding its obligations and its values, integrity and reputation.
- 3.2 Personnel have a responsibility to uphold these standards including the teachings and values of the Catholic Church and to avoid by word, action or public lifestyle, behaviours which are contrary to those teachings and values.
- 3.3 The Diocese is committed to the delivery of services consistent with the principles and standards detailed in *Integrity in Our Common Mission: National Code of Conduct for those exercising pastoral ministry in the dioceses of the Catholic Church in Australia*², supported by appropriate standards of professional and personal conduct contained within this Code.

¹ Australian Catholic Safeguarding LTD: *National Response Protocol*

² Australian Catholic Bishops Conference, *Integrity in Our Common Mission: National Code of Conduct for those exercising pastoral ministry in the dioceses of the Catholic Church in Australia*

- 3.4 The Diocese is committed to upholding the values and intent of the Diocese's *Safeguarding Statement of Commitment*:
- 3.4.1 *The Catholic Diocese of Townsville will do everything within its power to provide a safe environment for children and vulnerable adults to minimise the possibility of any harm. The Diocese commits to a zero tolerance approach to any form of abuse and reflects this commitment in its procedures.*
- 3.4.2 *The Catholic Church is called by Jesus to give priority of place to the welfare and well-being of children and vulnerable people. The voices of our most vulnerable in the Church should be heard and listened to so we see reality through their eyes.*
- 3.4.3 *The Catholic Diocese of Townsville believes that children and vulnerable people are a gift from God with an intrinsic right to dignity of life, respect and security from physical, emotional, spiritual and psychological harm.*
- 3.5 The Diocese manages the diverse nature of its ministry and business undertakings across the Agencies as autonomous divisions. Each Agency is required to establish, implement, and review appropriate Code of Conduct management governance such as policies, guidelines, committees, reporting and systems to manage Code of Conduct expectations, breaches and reports in accordance with their regulatory obligations. Formal reporting structures are outlined in Schedule 2: Roles and Responsibilities.
- 3.6 Code of Conduct Breaches
- 3.6.1 Personnel are expected to report to their manager any instance where they believe they, or anyone within their workplace, has breached an obligation under the Code.
- 3.6.2 Where the suspected breach involves their respective manager, personnel are required to report the matter immediately to their manager's supervisor.
- 3.6.3 Where personnel are not comfortable reporting breaches to their manager, they may use the provisions of the diocesan *Whistleblower Policy* or make a report through the diocesan *Complaints Management Policy*.
- 3.6.4 External parties reporting breaches of this Code should follow the processes in the diocesan *Complaints Management Policy*.
- 3.6.5 In all instances of a report relating to harm to a child or vulnerable adult that is received by the Diocesan Office, Ministries or Parishes, the Diocesan Director, Safeguarding, Culture and Shared Services must be immediately advised. Reports relating to Agency staff should be reported to the relevant Agency personnel, in alignment with the Agency reporting/complaint policies. If the Report relates to conduct that may amount to a criminal offence, this should be immediately reported to the Queensland Police Service.
- 3.7 Protected Disclosures
- 3.7.1 In reporting any suspected breach of this Code, personnel are entitled to seek support and protection when making such disclosures, and to be notified of the action taken in relation to the disclosure.
- 3.7.2 Personnel are not entitled to protection for disclosures which, on investigation, are found to be vexatious or malicious allegations, and may be liable for disciplinary action as a result.
- 3.8 Clergy and Religious
- Because of the trust given to clergy and religious and the privilege of being called to minister among the People of God, they must be conscious of the unique power and responsibility they have in pastoral relationships. In addition to this Code, clergy and religious must adhere to the principles and standards in the publication referred to in section 3.3.

4.0 CATEGORIES OF BREACHES OF THE CODE

There are 12 categories of Breach of the Code which have been identified to assist in managing any reported Breaches.

4.1 Safeguarding of Children and Vulnerable Adults

4.1.1 The Diocese is committed to creating and maintaining a supportive and caring environment which promotes the safety and inclusiveness of all children, including First Nations children, those with culturally and/or linguistically diverse backgrounds and children with a disability and/or particular vulnerabilities.

4.1.2 Personnel have legal and moral obligations to actively protect children and vulnerable adults in the course of their work, by:

- acting in accordance with the diocesan *Safeguarding Children and Vulnerable Adults Policy* and procedures;
- maintaining a duty of care for all children and vulnerable adults for whom they have responsibility; and
- reporting any conflicts of interest that they may have in relation to their work-related responsibilities to children and vulnerable adults.

4.1.3 Personnel of the Diocese must report, pursuant to the diocesan *Safeguarding Children and Vulnerable Adults Policy* and procedures:

- a child or class of children, who are at risk of serious harm;
- Personnel who have a reportable allegation made against them, or who have been charged or convicted of a reportable offence (against children or serious violence against adults);
- Personnel engaged in child-related work without a Working with Children Check; or
- Personnel who are alleged to have seriously breached professional standards with children or vulnerable adults.

4.1.4 Personnel must support diocesan investigations which will be undertaken pursuant to the diocesan *Safeguarding Children and Vulnerable Adults Policy* and procedures, into allegations of abuse, reportable conduct or breaches of professional standards against children or vulnerable adults by:

- maintaining neutrality during the investigative process;
- maintaining strict confidentiality about the investigation;
- being a truthful witness in the investigation; and
- volunteering any information that they hold that is relevant to the investigation.

4.2 Lawful Compliance

Personnel, while engaged by the Diocese must meet the obligations of the Diocese, namely act lawfully and comply with all legislative, contractual and industrial requirements. Personnel must comply with the Diocese's policies and follow all reasonable and lawful directions given by the Diocese.

4.3 Ethical Behaviour

Personnel are expected to:

- respect the dignity, rights and views of others;
- listen and seek to understand different points of view (this does not necessarily mean agreeing with the point of view);
- act respectfully at all times, including respecting cultural, ethnic and religious differences;
- acknowledge the genuine contributions that others make;
- express constructive feedback considerately and in a moderate tone;
- not harass, bully or discriminate against colleagues, students, people we support or members of the

community;

- be courteous, fair, sensitive and considerate to the needs of others;
- be honest and act with integrity at all times; and
- actively assist in managing workplace conflict that personally affects them or personnel under their supervision to create positive and constructive outcomes.

4.4 Professional Behaviour and Development

4.4.1 Personnel are expected to:

- maintain a high standard and quality of work;
- maintain and develop knowledge and understanding of their area of expertise;
- continuously seek to improve work performance and bring about improvements in the workplace;
- not ignore work duties or waste time during working hours;
- maintain confidentiality and privacy where required; and
- maintain adequate documentation to support any decision making.

4.4.2 Personnel are expected to:

- exercise care, responsibility and sound judgement when carrying out their duties;
- ensure procedural fairness is followed in all processes; and
- where relevant, adhere by any dress code requirements of the Diocese.

4.4.3 Personnel are expected to:

- take reasonable care of their safety and health;
- take reasonable steps that their acts/omissions do not adversely affect the health and safety of others;
- comply and cooperate with any reasonable instruction, policy or procedure, including with respect to work health safety matters;
- refrain from carrying out their duties under the influence of any substance (illegal or legal), or any drug which impairs work performance or poses a safety risk to themselves or others; and
- not operate a diocesan vehicle or other equipment/machinery if under the influence of alcohol (above the legal limits for their class of drivers' licence), any illegal substance, or any drug which impairs work performance.

4.4.4 Personnel are expected to:

- not take, or seek to take, improper advantage of any information gained in the course of their engagement;
- not take improper advantage of their position to benefit themselves or others; and
- not allow personal/political views/affiliations or other personal interest to influence the performance of duties or exercise of responsibilities.

4.5 Conflicts of Interest

4.5.1 A Conflict of Interest includes any circumstance, whether actual or perceived, arising from a conflict between the performance of a member of personnel's professional duties with the Diocese and their personal interests. Personnel are to take all appropriate steps to disclose a Conflict of Interest (or potential conflict) to the Diocese as soon as the member of personnel becomes aware of it.

4.5.2 A conflict can arise when there is a reasonable expectation of a personal benefit, direct or indirect, for a member of personnel that could influence the performance of their duties. This benefit may be financial or non-financial.

- 4.5.3 Personnel must take suitable measures to avoid, or appropriately deal with, any situation or relationship they may have where a Conflict of Interest could, directly or indirectly, compromise the performance of their duties.
- 4.5.4 Personnel may ask themselves the following questions to assist in identifying whether a situation or relationship is potentially a Conflict of Interest:
- Do I have a personal interest that may conflict or be perceived to conflict with my position at the Diocese?
 - Could there be benefits for me, now, or in the future, that could cast doubt on my objectivity to make decisions in my position at the Diocese?
 - How would my involvement in the decision or action be viewed by others?
 - Does my involvement appear fair and reasonable in all the circumstances?
- 4.5.5 The Policy Manager will keep a Conflict of Interest Register for personnel of the Diocesan Offices, Ministries, Parishes and (if appropriate) smaller Agencies. The Conflict of Interest Registers must be confidential and secured in appropriately secure digital or physical format.

4.6 Secondary Employment and volunteering

- 4.6.1 Personnel employed on a full-time, part-time and casual basis must seek approval from a Senior Executive/Parish Priest to undertake secondary employment or volunteering roles if:
- the secondary employment/volunteering may result in potential Conflicts of Interest that could adversely impact on their ability to perform their duties with the Diocese, including work, health and safety concerns;
 - the secondary employment/volunteering may affect the Diocese's financial position, reputation, services or standing in the community.
- 4.6.2 Approval for secondary employment is still required when personnel are on leave, including periods of leave without pay.
- 4.6.3 Where a member of personnel is already involved in secondary employment/volunteering roles, they must obtain the necessary approval if the secondary employment/volunteering falls into the categories outlined in 4.6.1 above.
- 4.6.4 Personnel are to notify their supervisor/Parish Priest if they intend to act in the capacity of a volunteer for the Diocese.

4.7 Management of Resources

- 4.7.1 Personnel must use the Diocese's resources economically and ethically. Such resources include finance, facilities, equipment (e.g., phones, IT equipment), vehicles, services (e.g., internet) and any other property which is owned or is the responsibility of the Diocese. Personnel also have a duty to ensure the diocesan resources are used only for their intended purpose, are well maintained and secured against theft or misuse.
- 4.7.2 Personnel are fully accountable for the use of the Diocese work time and resources. Personnel should not use the Diocese work time or resources for an outside interest, secondary employment or personal gain. Such examples include the development of a new commercial idea or writing a book.

4.8 Gifts and Benefits

- 4.8.1 Personnel must not solicit or accept gifts, benefits or hospitality which might be reasonably seen to either directly or indirectly compromise or influence their professional duties with the Diocese.
- 4.8.2 All gifts must be brought to the attention of the relevant manager who will decide how the gift should be treated.

4.8.3 Generally, gifts of a nominal value or moderate acts of hospitality offered as a genuine thank you by a client, may be personally retained as long as they have not been solicited by personnel or could be seen to have compromised or unduly influenced a member of personnel's professional duties with the Diocese.

4.8.4 Gifts or hospitality offered as an inducement to purchase, provide information or treat someone favourably are not acceptable regardless of their monetary value. Examples of inducement include a recruitment agency offering theatre tickets for each temporary person engaged.

4.8.5 Gifts, such as a Christmas hamper or a box of chocolates from a consultant, should be shared and made available for consumption by all personnel. Consideration should also be given to donating such gifts to charity.

4.9 Social Media

Personnel should not use social media in a manner which may bring the Diocese into disrepute nor in a way that conflicts with the values and teachings of the Catholic Church.

4.10 Public Comment

Only personnel authorised by the Bishop or his delegate are permitted to make public statements or give interviews on behalf of the Diocese to a media representative.

4.11 Confidentiality

4.11.1 Personnel must not divulge, either during employment or after, any confidential information gained as a member of personnel of the Diocese.

4.11.2 Personnel of the Diocese are expected to:

- Abide by the diocesan *Privacy Policy* and associated guidelines and documents to ensure compliance with relevant laws and regulations regarding the collection, dissemination, use, sharing and security of all personal and sensitive information;
- Treat confidential and personal information about colleagues, volunteers, students, people we support and other members of the community respectfully;
- Only use such information for work-related purposes; and
- Only communicate such information to those who need to know in order to perform their role.

5.0 APPLICABILITY

5.1 The Code applies to all Church personnel of the Parishes, Ministries and Agencies of the Diocese.³

5.2 Some larger agencies (e.g., Catholic Education, Centacare) will have their own Codes of Conduct that meets their particular requirements and are in accord with the terms and intent of this policy.

6.0 RESPONSIBILITIES

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|----------------|---|
| Policy Owner | The Policy Owner for all diocesan policies is the Bishop. |
| Policy Manager | The Policy Manager for this policy is the Diocesan Director Safeguarding, Culture and Shared Services. |
| Communication | <ul style="list-style-type: none">• The Policy Manager is to advise all Agencies, Ministries and Parishes covered by this policy and its enacted date.• The Parish Priest or Parish Administrator is to advise the Parish staff and committees of this policy and its compliance.• The Senior Executives are to provide advice and communicate this Policy to |

³ Australian Catholic Safeguarding LTD: *National Response Protocol*

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| | all Agency staff and volunteers. |
| Compliance | <ul style="list-style-type: none"> Each Senior Executive is responsible for implementing appropriate policy/systems/processes for their Agency/Division to effectively identify and manage Code of Conduct breaches. Minor non-compliance of this Policy in the first instance is to be drawn to the attention of the supervisor or manager of the relevant personnel for discussion and remedial action. Continued non-compliance should be reported to the Senior Executive of the Agency (or their delegate), Parish Priest or Administrator and the Policy Manager who will determine if a report to the Bishop is required. In all instances of a Report relating to Harm to a child or vulnerable adult the Diocesan Director Safeguarding, Culture and Shared Services must be immediately advised. If the Report relates to conduct that may amount to a criminal offence, this should be immediately reported to the Queensland Police Service. In all instances of a serious Breach, the Bishop must be informed immediately. |
| Monitoring and Review | The Policy Manager has responsibility to review the policy every three years (or sooner if required) to ensure it is compliant with relevant diocesan goals, legislation/regulation and diocesan requirements. |
| Reporting | The Diocesan Director Safeguarding, Culture and Shared Services will report to the Bishop at the time of the policy review. |
| Accessibility | This policy will be available to external diocesan stakeholders and placed on the diocesan website. |

7.0 SCHEDULES TO THIS POLICY

Schedule 1 Catholic Diocese of Townsville Safe Conduct Standards

Schedule 2 Roles and Responsibilities

8.0 RELATED POLICIES, PROCEDURES AND RESOURCES

- Catholic Diocese of Townsville Privacy Policy
- Catholic Diocese of Townsville Safeguarding Children and Vulnerable Adults Policy and procedures
- Catholic Diocese of Townsville Whistleblower Policy
- Catholic Diocese of Townsville Compliance Policy
- Australian Catholic Bishops Conference: *Integrity in Our Common Mission: National Code of Conduct for those exercising pastoral ministry in the dioceses of the Catholic Church in Australia*
- Australian Catholic Safeguarding LTD: *National Response Protocol*

| Version Date | Enacted Date | Comments |
|--------------|--------------|---------------------------------------|
| August 2022 | August 2022 | Original Policy and Guidelines |
| June 2025 | June 2025 | Updated Policy. Guidelines rescinded. |
| Review Date: | June 2028 | |

Approved By:



Date: 12 June 2025

Most Rev Timothy Harris DD
Bishop of Townsville

DEFINITIONS

Breach: A Breach of the Code of Conduct occurs when any personnel within their workplace breached an obligation under this Policy including any improper use, waste or abuse of resources, corrupt or fraudulent conduct or inadequate administration or accountability.

Church Personnel: A cleric, member of a religious institute or other person (other than a cleric or a member of a religious institute) who is employed by the Roman Catholic Trust Corporation for the Diocese of Townsville or engaged on a contract, subcontract, voluntary or unpaid basis. (Australian Catholic Safeguarding LTD: *National Response Protocol*)

Conflict of Interest: Includes any circumstance, whether actual or perceived, arising from a conflict between the performance of a member of personnel's professional duties with the Diocese and their personal interests.

Drugs (illicit substances): For the purpose of this policy, this term should be taken to cover any substance or item whose possession is prohibited under the Drugs Misuse Act 1986.

Harm: Refers to any detrimental effect of a significant nature on the person's physical, psychological or emotional wellbeing. It is immaterial how the harm is caused. Harm can be caused by physical, psychological, or emotional abuse or neglect; or sexual abuse or exploitation. It may be caused by a single act, omission or circumstance; or a series or combination of acts, omission or circumstances.

Lawful Compliance: Behaviours and practices that are conducted in accordance with local laws, Queensland and Australian legislation and regulations.

Obligation: A requirement specified by laws, regulations, codes or organisational standards, which are documented codes of ethics, Code of Conduct, good practices and charters that the Diocese, Agencies and Parishes have adopted across its operations.

SCHEDULE 1: CATHOLIC DIOCESE OF TOWNSVILLE SAFE CONDUCT STANDARDS














'Respecting & Protecting Children & Vulnerable Adults'

The Diocese of Townsville is committed to safeguarding everyone involved in its ministries & services, but gives special priority to the safety & wellbeing of children & vulnerable adults. Therefore, all Diocesan personnel are expected to conduct themselves in accordance with these standards in all interactions with children & vulnerable adults, including on line. These standards are also to be read in conjunction with other relevant Diocesan behaviour standards or codes of conduct.






Child - a person under 18 years of age.

Vulnerable Adult (adults at risk) - Any individual aged over 18 years who due to their diverse circumstances and experiences, may place them at increased risk of abuse or exploitation.

I will:

-  Promote the rights & safety of children & vulnerable adults
-  Comply with policies & procedures that safeguard children & vulnerable adults
-  Treat children & vulnerable adults with respect & dignity
-  Respect & protect the privacy of children & vulnerable adults
-  Comply with Diocesan protocols for communicating with children & vulnerable adults
-  Maintain proper personal & professional boundaries with children & vulnerable adults
-  Listen & respond to the views & concerns of children & vulnerable adults
-  Respect cultural & religious differences of children & vulnerable adults
-  Identify & manage risks to the safety & wellbeing of children & vulnerable adults
-  Promptly respond to any concerns or complaints of abuse or harm to children & vulnerable adults
-  Report all suspected or disclosed abuse or harm to children or vulnerable adults in accordance with Diocesan protocols
-  Comply with legal reporting obligations in respect to suspected abuse or harm to children or vulnerable adults
-  Report any suspected breaches of these conduct standards

I will not:

-  Engage in any unlawful activity with or in relation to a child or vulnerable adult
-  Engage in any activity that is likely to physically, emotionally, sexually or spiritually harm a child or vulnerable adult
-  Expose a child or vulnerable adult to sexual videos or images
-  Use harsh or offensive language towards or in the presence of a child or vulnerable adult
-  Unlawfully discriminate against a child or vulnerable adult or their family or carers
-  Be alone with a child or vulnerable adult unnecessarily
-  Engage in unnecessary physical contact with a child or vulnerable adult
-  Use physical violence or corporal discipline on a child or vulnerable adult
-  Supply liquor or a prohibited drug to a child or vulnerable adult
-  Engage with children while under the influence of liquor or a prohibited drug
-  Arrange personal contact, including online, with a child or vulnerable adult for a purpose not related to my ministry or work with the Diocese
-  Receive, produce or share sensitive information about a child or vulnerable adult, including images, unless I have proper consent or am authorized to do so legally or under Diocesan policy
-  Ignore or disregard suspected or disclosed abuse or harm to a child or vulnerable adult

SCHEDULE 2: ROLES AND RESPONSIBILITIES

| Role | Code of Conduct Management Policy responsibility | Frequency |
|---|---|-------------------|
| Bishop | <ul style="list-style-type: none"> Approve Code of Conduct Policy. | Every three Years |
| DFC & DCLG | <ul style="list-style-type: none"> Review Code of Conduct Policy. | Every three Years |
| Agency Council | <ul style="list-style-type: none"> Review and endorse Agency Codes of Conduct and breach management processes. | Every three years |
| Agency Senior Executives | <ul style="list-style-type: none"> Responsible for implementing Codes of Conduct and breach management processes for their Agency/Division. Provide advice and communicate this Policy to all Agency staff and volunteers. Receive reports of non-compliance and report all instances of serious non-compliance to the Bishop. Advise the Bishop of any Code of Conduct breaches/reports that constitute a high level or strategic risk, in accordance with the diocesan <i>Risk Management Policy</i>. Coordinate Code of Conduct training for personnel within the Agency. | Ongoing |
| Priests and Parish Administrators | <ul style="list-style-type: none"> Advise the Parish staff and committees of this Policy and its compliance. Approve engagement by personnel in any secondary employment or business activity. | As required |
| Director, Safeguarding, Culture and Shared Services | <ul style="list-style-type: none"> Policy Manager of the Code of Conduct Policy. Advise all Agencies, Divisions and Parishes covered by this policy and its enacted date. Holds the diocesan Conflict of Interest Register. Review the Code of Conduct Management Policy and Process every three years or sooner, in consultation with Agency Senior Executives. | Every three Years |
| | <ul style="list-style-type: none"> Facilitate Code of Conduct training for personnel where required. | Ongoing |
| Senior Manager, People & safety | <ul style="list-style-type: none"> Establish and maintain the Conflict-of-Interest Register for Parish and Diocesan Office personnel. | Ongoing |
| External Review (external provider) | <ul style="list-style-type: none"> Third party review of Code of Conduct Policy and Process. Code of Conduct Management Health Check, to determine the adequacy of nominated controls, and identification of Code of Conduct breaches. | Every two years |