

# Code of Conduct



POLICY NUMBER	1.0.0
TOPIC	Code of Conduct
OWNER	Deputy Chief Executive - People and Culture
DATE APPROVED	8 September 2022
APPROVER	Board
DATE OF NEXT REVIEW	8 September 2025

## 1 Code Statement

ACC is charged with the implementation of the Accident Compensation Act 2001. In fulfilling this duty, ACC's vision is to create a unique partnership with every New Zealander, improving their quality of life by minimising the incidence and impact of injury.

As a Crown entity, ACC is part of the Public Sector and contributes to building the trust and confidence of citizens in the institutions of government.

All Public Sector organisations are expected to work with a spirit of service to the community, to make our services accessible and effective to those who need them, and to strive to make a positive difference to the wellbeing of New Zealanders.

Everyone who works for ACC has an important role to play in making sure we achieve our vision, and in ensuring we maintain our reputation and standing in the perception of the public. Our actions and behaviours must be consistent with these expectations at all times.

## 2 Objective

This Code governs the behaviours of all employees of ACC, to enable us to meet the expectations placed upon us as a Crown Entity. These standards are based on the standards that apply to all Public Services, detailed in the [Te Kawa Mataaho Standards of Integrity and Conduct](#).

The Code of Conduct:

- can be used to provide coaching on appropriate conduct
- enables recognition of those who model the desired standard of conduct
- reflects and reinforces the ACC values and behaviour required
- outlines inappropriate behaviour and its consequences.

### 3 Scope

All ACC employees and contractors are expected to maintain the highest standards of integrity, discretion and ethical conduct when performing duties or representing ACC in any way.

All employees of ACC must read, understand, and follow our Code of Conduct.

### 4 Code standards

You are expected to exercise good judgement to determine what action to take in a given situation

Your actions need to be able to withstand scrutiny from internal and external parties. Our behaviour and actions must be seen to be fair, impartial, responsible and trustworthy at all times.

In order to achieve the high standards of behaviour expected of us, as an employee or contractor you must:

#### **Be honest and act with integrity.**

In all aspects of your employment (e.g. in your work with clients and levy payers, with regard to work attendance, requests for financial reimbursement, use of sick leave etc)

#### **Respect the rights of others.**

- Treat others fairly, courteously, equally, and without discrimination or harassment
- Uphold the rights of clients, as specified in the [Code of ACC Claimants' Rights](#).
- Respect and respond to all cultures, values and beliefs, particularly Māori and minority groups
- Promote the principles of [Equal employment opportunity](#).

#### **Perform your duties to the best of your ability.**

- Prioritise your primary role as an ACC employee over any secondary interests, commitments, values or beliefs you hold personally, and declare any potential [Conflict of interest](#) immediately.
- Show commitment to a high quality of work.
- Adhere to the ACC [Health, Safety and Wellbeing policy](#) in all areas of work.
- Comply with all ACC policies, processes and standards
- Model and demonstrate [ACC values](#) and behaviours, which underpin decisions about what we do, and how we operate and behave
- Comply with the code of any professional body that you are registered or affiliated with, where this impacts upon your work with ACC
- Show initiative and creativity when resolving problems, seek to maximise productivity, and identify opportunities for improvement

Make decisions appropriate to your role and be responsible for those decisions and the actions that result from them

- Be supportive of changes made by ACC, as change is necessary for the organisation's success
- Be supportive of your colleagues and accept your responsibilities as a team member

- Manage your personal and workplace relationships appropriately so they do not adversely affect your work.

### **Uphold the reputation and standing of ACC.**

- Act with integrity in any personal dealings you may have with ACC as a client
- Obtain your manager's approval before commencing any activity, business interest or employment that has the potential to conflict with ACC business (e.g. acting as an advocate for a client, undertaking secondary employment)
- Ensure your behaviour in relation to [gifts and gratuities](#), managing contracts and [pur chasing](#), and other sensitive expenditure does not compromise (or appear to compromise) your personal integrity or ACC's.
- Maintain appropriate professional behaviour when travelling on ACC business
- Maintain appropriate professional behaviour in any situation where you may be perceived as representing ACC.
- Have an appropriate standard of dress
- Engage with the Media team about any media enquiries you receive.
- Ensure that your behaviour will not bring ACC into disrepute
- Advise your manager of any convictions or charges laid against you whilst employed by ACC.
- Maintain appropriate boundaries and relationships with clients and any other people you may work with.

### **Act in a politically neutral manner.**

- Ensure that your behaviour maintains Ministerial and public confidence in the impartiality of advice given and actions taken
- Ensure that your comments do not bring ACC or the Minister into disrepute, or compromise the perception of ACC as politically neutral (e.g. stating or implying your personal view on an issue as ACC's view)
- Ensure that your personal participation in political matters does not conflict with (or appear to conflict with) your duty to act in a politically neutral manner.

### **Use ACC information and property appropriately.**

- Be responsible for the security and confidentiality of all information that you deal with during your employment with ACC
- Use financial and non-financial information gathered by ACC and your knowledge of ACC's systems and processes only to perform ACC's business
- Treat all ACC assets and property with care and respect
- Respect the privacy of ACC's clients, staff, and stakeholders and keep their personal information confidential
- Take all reasonable steps to protect the privacy of our clients, customers, employees and other stakeholders
- Only access client, colleague, and stakeholder personal information for ACC purposes related to your role (in particular, do not access information for non-work purposes)

- Report any actual or potential privacy breaches to your manager immediately.

### Act within the law.

- In particular, the Accident Compensation Act 2001, Official Information Act 1982, Privacy Act 2020, Health Information Privacy Code 2020, Human Rights Act 1993, Employment Relations Act 2000 and any other relevant legislation.

## 5 Accountabilities

The Deputy Chief Executive - People and Culture is responsible for ensuring organisational controls are in place in support of this policy.

## 6 Roles and Responsibilities

Role:	Responsibility
Employees	<ul style="list-style-type: none"> <li>• Read, understand and follow this Code of Conduct.</li> <li>• Undertake training or confirm your understanding of the Code of Conduct when requested by ACC</li> <li>• Remain up to date with the current Code of Conduct expectations.</li> <li>• Discuss any concerns about what may be considered unacceptable behaviour with your manager.</li> <li>• Discuss with your manager before you take any course of action that you are not entirely sure falls within the bounds of acceptable behaviour.</li> <li>• If you believe someone in ACC is acting unethically, or has been involved in serious wrongdoing, you should report this confidentially through OK2Say and receive protection under the Protected Disclosure Act. For more information, visit <a href="#">Making a protected disclosure</a>.</li> </ul>
Contractors	<ul style="list-style-type: none"> <li>• Maintain the highest standards of integrity, discretion and ethical conduct when performing duties or representing ACC in any way.</li> </ul>
Managers	<p>Managers are representatives of ACC both when dealing with external customers or stakeholders, and when dealing with internal employees and contractors. Managers have a lead role in establishing and promoting our expected standards of behaviour and integrity. Managers are expected to conduct their behaviour, actions and decisions consistently with their duty to be fair, impartial, trustworthy and responsible at all times.</p> <p>As a manager you are expected to:</p> <ul style="list-style-type: none"> <li>• establish and promote ACC's expected standards of behaviour and integrity</li> <li>• consider your behaviour, actions and decisions in terms of the expectation to be fair, impartial, trustworthy and responsible at all times</li> <li>• manage employees in accordance with the Code of Conduct, and any other ACC policies, processes, standards and systems in place to support you as a manager (e.g. development programme, performance management processes)</li> <li>• lead, model and promote the expected standards of behaviour and integrity within the Code of Conduct and other internal policies and processes</li> <li>• provide employees with education and coaching on expected standards of behaviour and integrity where needed</li> </ul>

	<ul style="list-style-type: none"> <li>represent ACC positively when interacting with staff, and deliver our policies, changes, initiatives or decisions in a manner consistent with ACC's intentions</li> <li>take ultimate responsibility for work quality, actions and decisions of employees in your team by addressing concerns</li> <li>manage within your capabilities and take ownership of your own development, and that of your team</li> <li>manage within the delegated authorities framework as specified in the Delegations Manual</li> </ul>
Deputy Chief Executive - People and Culture	<ul style="list-style-type: none"> <li>Monitor the effectiveness of the Code of Conduct</li> <li>Ensure organisational controls are in place in support of this policy</li> </ul>
Executive	<ul style="list-style-type: none"> <li>Model the highest standard of behaviours according to this Code of Conduct</li> <li>Ensure Code of Conduct behaviours are integrated into all aspects of ACC business</li> </ul>
Board	<ul style="list-style-type: none"> <li>Approve the Code of Conduct and ensure it is consistent with ACC's strategic direction.</li> </ul>

## 7 Monitoring and Oversight

Lines of Assurance:	Role	Monitoring & Oversight
1st Line	Employees and Managers	<ul style="list-style-type: none"> <li>Employees are expected to comply with the Code of Conduct.</li> <li>Managers make employees aware of the Code of Conduct and monitor compliance.</li> </ul>
2nd Line	People & Culture Group	<ul style="list-style-type: none"> <li>The People and Culture Group oversees overall compliance with this policy and obtains feedback on its effectiveness.</li> <li>The Employment Relations Team provides oversight of employment relations issues, including those relating to breaches of the Code of Conduct to ensure that proper procedures are followed.</li> </ul>
3rd Line	Assurance	<ul style="list-style-type: none"> <li>Third line functions provide independent information on the overall effectiveness of the Code of Conduct.</li> <li>This includes Assurance Services' schedule of continuous assurance activities for People and Culture processes and assessment of our compliance with obligations.</li> </ul>
4th Line	Executive	<ul style="list-style-type: none"> <li>The Chief Executive and Deputy Chief Executives have overall responsibility for ensuring compliance with Code of Conduct policies and processes.</li> </ul>
5th Line	Board	<ul style="list-style-type: none"> <li>The Board approves the Code of Conduct and ensure it is consistent with ACC's strategic direction.</li> </ul>

## 8 Breaches of Policy

Our Code of Conduct requires our people to comply with all our policies. Breaches of this policy may result in disciplinary action.

Behaviour or actions that are investigated and found to be in breach of the Code of Conduct may result in disciplinary action. Where breaches are found, ACC's [Disciplinary procedure](#) will be followed and the employee will have an opportunity to provide an explanation for their actions or behaviours and have the right to representation.

The action taken will depend on the severity of the breach:

- Breaches of the Code of Conduct that are deemed 'misconduct' may lead to disciplinary action up to and including a final warning.
- Breaches of the Code of Conduct that are deemed 'serious misconduct' may lead to disciplinary action up to and including summary dismissal. Summary dismissal is termination of employment without notice or prior warnings.

If any breaches normally considered to be misconduct are very serious or repeated, these may be deemed serious misconduct.

### Misconduct

Misconduct occurs when an employee does something wrong (namely, breaches this Code of Conduct or other ACC policy) either by: doing something or omitting to do something, or through their behaviour.

The lists below of actions considered to be misconduct or serious misconduct are intended as a guide for employees, and are example only. They do not constitute an exhaustive list of breaches of the Code of Conduct.

Examples of misconduct include:

- Any act of negligence harming ACC
- Disobeying a lawful and reasonable instruction from a manager
- Failure to meet the standards of performance and behaviour expected of ACC employees
- Inappropriate behaviour or relationships
- Any action which may in any way damage the relationship of trust and confidence between ACC and government, other agencies or the community
- Allowing unauthorised access to, or disclosure of, any matter or information in relation to ACC business
- Misuse of ACC internet and/or email systems
- Inappropriate use of purchasing card or expenses
- Absence from duty or place of work without proper reason or authorisation
- Repeated lateness for work, or repeated absenteeism without just cause
- Failure to comply with any ACC policy or procedure
- Any behaviour of a similar type.

## Serious misconduct

Serious misconduct occurs when the misconduct could have the effect of destroying or undermining the relationship of trust and confidence between an employee and employer.

Examples of serious misconduct include:

- Dishonesty
- Theft
- Fraud
- Handling a claim relating to oneself, a relative, acquaintance or friend without the express approval of the manager, or taking a role as an advocate for a client without approval
- Corruption – accepting a bribe, inducement, reward or gift, or complying with a request or threat to use your position to provide a benefit to any person or third party, which has the effect of allowing inappropriate activity or compromising the impartial performance of your duties
- Failure to declare any activity, business interest or employment that has the potential to conflict with ACC business
- Accessing ACC information relating to family, friends, acquaintances or clients without legitimate cause
- Criminal conviction leading to imprisonment or adversely affecting your ability to carry out your work.
- Misuse or unauthorised possession or sharing of ACC property and/or information (e.g. misuse of financial information or client information)
- Harassment of anyone you work with (e.g. client, employee, contractor)
- Abusive or discriminatory statements or practices
- Assaulting or abusing another person
- Allowing work performance to be affected by drug, alcohol or substance abuse (including abuse during work hours)
- Dangerous or unsafe work practices, including non-compliance with ACC Health and safety policies, and Health and Safety legislation
- Any act that has the potential to bring ACC into disrepute
- Significant failure to comply with any ACC policy or procedural requirements
- Any behaviour of a similar type.

## 9 Contacts

Contact [HR Help](#) regarding this policy.

## 10 References

Te Kawa Mataaho [Standards of integrity and conduct](#)

### Policies:

[Respectful and Inclusive Workplace](#)

[Conflict of interest](#)

[Protected disclosure](#)  
[Equal employment opportunity](#)  
[Sensitive expenditure](#)  
[Health, Safety and Wellbeing](#)  
[Information security](#)  
[Use of the Internet](#)  
[Email and instant messaging](#)  
Media  
Social media  
[Privacy](#)  
[Procurement](#)  
[Corporate Delegations](#)

## **11 Policy review dates**

Last review: 8 September 2022

Next review: [ ]

Proactively released