

BUSINESS ETHICS

POLICY®

DOCUMENT SUMMARY/KEY POINTS

- This Business Ethics Statement has been developed in accordance with the Independent Commission Against Corruption (ICAC) publication – Developing a statement of business ethics.
- It provides private sector organisations and persons in Australia and overseas with guidance when conducting business with the Sydney Children's Hospitals Network (SCHN) in order to maintain high standards of integrity and ethical conduct are maintained.
- Private sector organisations and persons include contractors, consultants, suppliers, tenderers and business partners.

Relevant SCHN Policies *(as amended or updated from time to time)*

- Code of Conduct
- Fraud Control Strategy
- Public Interest Disclosures
- Conflicts of Interest and Received Gifts and Benefits – Reporting
- Corrupt Conduct - Reporting to the Independent Commission Against Corruption (ICAC)

This document reflects what is currently regarded as safe practice. However, as in any clinical situation, there may be factors which cannot be covered by a single set of guidelines. This document does not replace the need for the application of clinical judgement to each individual presentation.

Approved by:	SCHN Policy, Procedure and Guideline Committee	
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Team Leader:	Internal Audit Executive	Area/Dept: Finance

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This Policy/Procedure may be varied, withdrawn or replaced at any time. Compliance with this Policy/Procedure is mandatory.

CHANGE SUMMARY

- Due for mandatory review, no major changes.
- November 2020 – policy reviewed and no major changes.

READ ACKNOWLEDGEMENT

- All SCHN staff should be aware of this document.

This document reflects what is currently regarded as safe practice. However, as in any clinical situation, there may be factors which cannot be covered by a single set of guidelines. This document does not replace the need for the application of clinical judgement to each individual presentation.

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1 Commitment

The Sydney Children's Hospitals Network (SCHN) is committed to maintaining high standards of integrity and ethical conduct.

This statement provides the private sector with guidance when conducting business with the SCHN. It outlines ethical standards and expectations, and also outlines what the private sector can expect from the SCHN during business dealings.

Our business dealings are transparent and open to public scrutiny wherever possible.

2 Business Principles

The SCHN is committed to the purchase of goods, equipment and services through established NSW Government contract systems where possible and reasonably practical.

If NSW Government contract systems are not used, all procurement processes will be conducted in accordance with the SCHN procurement principles.

The SCHN key procurement principles are:

- best possible value for money;
- fair, open and effective competition; and
- impartiality and integrity in business dealings.

Value for money does not automatically mean the lowest price. It is determined by considering the factors which are relevant to the particular purpose of the procurement. Factors include quality, reliability, timeliness, service and initial and ongoing costs.

All business dealings with the SCHN are expected to be honest, transparent, ethical, fair and consistent.

3 What You Can Expect From The SCHN

The SCHN will ensure that all its policies, procedures and practices related to procurement are consistent. All SCHN staff are bound by a Code of Conduct. Refer to NSW Health Policy Directive PD2015_049 "NSW Health Code of Conduct" (*as amended and updated from time to time*) https://www1.health.nsw.gov.au/pds/ActivePDSDocuments/PD2015_049.pdf

4 What The SCHN expects

All goods and service providers are expected to:

- observe and comply with the SCHN procurement policies and procedures including tendering;
- provide accurate, concise and reliable information when required;

- declare actual or perceived conflicts of interest as soon as these conflicts are recognised;
- act ethically and honestly in all dealings;
- take all reasonable measures to prevent the unauthorised disclosure of the SCHN confidential information;
- refrain from discussing the SCHN business or information in the media prior to obtaining the SCHN's written consent;
- refrain from offering staff inducements or incentives (eg hospitality, gifts, sponsorship or other benefits) designed to unfairly persuade the SCHN staff (eg securing or attempting to secure influence or favour from the SCHN or individual staff); and
- assist SCHN in identifying and eradicating unethical practices.

5 Conflict of Interest

All SCHN staff are required to declare any actual or perceived conflicts of interest under the SCHN policy titled Conflicts of Interest and Received Gifts and Benefits – Reporting.

The SCHN extends this requirement to all our contractors, consultants, suppliers, tenderers and business partners.

6 Incentives, Gifts, Benefits, Hospitality, Meals, Travel and Accommodation

The SCHN expects all staff to decline incentives, gifts, benefits, hospitality, meals, travel and accommodation offered during the course of their work.

Token gifts may be accepted (e.g. a box of chocolates or flowers). All SCHN staff are required to declare received gifts and benefits under the SCHN policy titled Conflicts of Interest and Received Gifts and Benefits – Reporting.

7 Commercial-in-Confidence and Confidentiality

Information stored in any media which is marked confidential, or which a reasonable person would expect to be confidential, shall be treated confidentially.

8 Communications Between Parties

All communications shall be clear, direct and accountable to minimise the perception of inappropriate influence on all dealings.

9 Intellectual Property Rights

All parties shall respect each other's intellectual property rights and should formally negotiate any access, license or use of intellectual property.

10 Bullying, Harassment and Discrimination

NSW Health and the SCHN consider workplace bullying, harassment and discrimination unacceptable. It will not be tolerated under any circumstances.

11 Use of The SCHN Facilities, Resources and Information

The SCHN facilities, resources and information must only be used for official purpose.

12 Contracting Employees

All contracted and sub-contracted employees are expected to comply with the SCHN Business Ethics policy. All contractors are responsible for ensuring their sub-contractors comply with the SCHN Business Ethics policy and are aware of the consequences of breaching these rules.

13 Outside Employment and External Business Activities

All SCHN full time staff wishing to engage in paid employment / other business activities (including participation in a family company) must seek the SCHN Chief Executive's approval.

All part-time or casual SCHN staff are required to advise the SCHN Chief Executive of any real or potential conflict of interest between their employment at the SCHN and any other employment.

14 Protected Disclosures

Public officials, including SCHN staff, reporting corrupt conduct, maladministration, serious and substantial waste, and government information contravention are protected by the *Public Interest Disclosures Act 1994* (NSW). Refer to NSW Health Policy Directive PD2016_027 Public Interest Disclosures (*as amended and updated from time to time*)
https://www1.health.nsw.gov.au/pds/ActivePDSDocuments/PD2016_027.pdf

15 Why is Compliance Important?

Not complying with the SCHN ethical requirements could lead to:

- termination of contracts;
- loss of future work and reputation;
- investigation for corruption; and/or
- the matter being referred for criminal investigation.

16 Reporting Unethical Behaviour

If you are concerned about a possible breach of this statement, or about any conduct that could involve corrupt conduct, maladministration, serious and substantial waste, and government information contravention, inform your manager or contact the SCHN Internal Audit Executive directly by letter to Locked Bag 4001, Westmead, NSW 2145, Australia or by e-mail.