



# Our code of conduct

## Introduction

Lotterywest is a wonderful place to work. We are an organisation which really makes a difference. Our work touches all Western Australians in their lifetimes through the opportunities and value Lotterywest adds to the community.

But what is it that assures that Lotterywest is a great place to work? It's the people: how we work; how we work together; and how we live our organisation's values at work.

So this document, the Lotterywest Code of Conduct is key to us all. It provides a clear guide to the ways we should work together and the ethical basis of our operations and workplace behaviour.

I urge you to read, understand and live this document. Its principles are relevant to us all and play an integral part in ensuring we are, and continue to be a proud part of the business we represent.

A handwritten signature in black ink that reads "Susan Hunt".

Susan Hunt PSM  
Chief Executive Officer  
Lotterywest

## Statement of compliance from the Lotterywest Board

The Lotterywest Board oversees compliance across Lotterywest through a compliance framework.

This provides principles and guidance for all Lotterywest management.

The Board's Audit and Risk Management Committee oversees and ensures a continuing high standard of compliance practice for Lotterywest.

This Code of Conduct is underpinned by:

### The Lotterywest values

**Customer Focused:** We align our business culture to the ever-evolving needs and requirements of the people and organisations we work with. We offer products, services and solutions to provide the best possible customer experience.

**Upbeat:** We enjoy working for a vibrant organisation, providing hope and opportunity. We are bold, motivated and confident in our collective ability.

**Authentic:** We are true to ourselves by being open, honest and committed.

**Smart:** We find ways to do the right things better.

**Reliable:** Clarity of expectation, consistency of delivery, quality outcome.

**Adaptable:** We know our business and our environment. We make the most of opportunities and choose when and how to change.

## Lotterywest's Code of Ethics

**Personal Integrity:** We act with care and diligence and make decisions that are honest, fair, impartial, and timely, and consider all relevant information.

**Relationship with others:** We treat 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.

The Code of Ethics is based on the Public Sector Code of Ethics which sets out the minimum standards of conduct and integrity for all public sector employees.

### Accountable and Ethical Decision Making

The Western Australian Public Sector Commission oversees the public sector. Its framework for accountable and ethical decision-making, First Steps should be applied to any situation covered under the Code of Conduct.

- Am I doing the right thing?
- How would others judge my actions?
- How could my actions impact on others?
- Should I discuss this with someone else?

## Personal Behaviour

### What does Lotterywest expect from its employees?

- We act **ethically and with integrity** in the performance of duties.
- We treat members of the public and colleagues with **respect, courtesy and fairness, and have proper regard for their interests, rights, safety and welfare.**
- **We make decisions fairly, impartially and promptly**, giving consideration to all available information, legislation and Lotterywest's policies and procedures.
- **We take responsibility** for our actions and decisions
- **We are always professional.**
- **We do not harass, bully or discriminate.**
- **We support** a harmonious, safe and productive work environment.

### Decision making questions for personal behaviour:

- Are my actions legal and consistent with government and Lotterywest policies and the Lotterywest code of conduct?
- Do I meet the minimum standards of conduct and integrity expressed in the Lotterywest code of conduct?
- What impact could my actions have on Lotterywest, other staff, community, customers, family and friends?
- Would my actions stand up to public scrutiny?
- Do I need help? Should I discuss this with someone else?

### Relevant Legislation, Regulation and Policy

Corruption and Crime Commission Act 2003  
Criminal Code – Chapter x111  
Disability Services Act 1993  
Equal Opportunity Act 1984  
Financial Management Act 2006  
Freedom of Information Act 1992  
Lotterywest Complaints Management Policy  
Lotterywest Discipline Policy  
Lotterywest Equity and Diversity Policy  
Lotterywest Fit for Work Policy  
Lotterywest Performance Development Process  
Lotterywest Grievance Policy  
Lotterywest Information Services Security Quality Management System Policy  
Lotterywest Performance Management Policy  
Lotterywest Sub-Standard Performance Policy  
Occupational Safety and Health Act 1984  
Occupational Safety and Health Regulations 1996  
Public Interest Disclosure Act 2003  
Public Sector Management Act 1994  
State Records Act 2000

## Communication and Official Information

### What does Lotterywest expect from its employees?

- We maintain appropriate **confidentiality and privacy** of all official information.
- We **do not use official information for personal or commercial gain** for ourselves or others.
- **We do not speak for Lotterywest unless approved** and ensure any public comments, including those we make on social media and network sites, are made in our personal capacity.
- **We adhere to Government policy, protocols as well as to Lotterywest internal policies and directives.**

Decision making questions for communication and official information:

#### Who?

- Am I authorised to release this information?
- Is the person to whom I'm giving the information authorised to receive it?
- Even if the information is not sensitive or confidential, does the person I'm disclosing it to really need to know?

#### What?

- Are there any policies or directives precluding the release of this information?
- What is the nature of the information?
- Could it be considered sensitive?
- Does the person need, or is it appropriate to release, all of this information?

#### Why?

- What is the reason or motive for releasing this information?
- Is it for official purposes?
- Will this information benefit me in any way and therefore be considered as privileged? I.e. Do I need to consider if I have a conflict of interest?

#### When?

- Do I need to consider the timing?
- When would it be best to disclose this information?

### Relevant Legislation, Regulation and Policy

Administrative Instruction 711 Disclosure of Official Information

Administrative Instruction 728 How Public Comments are to be made by Authorised Officers

Copyright Act 1968

Corruption and Crime Commission Act 2003

Criminal Code – Chapter X111

Lotterywest Communication Guidelines

Lotterywest Guidelines for Access to Lotterywest

Computer Rooms Procedure

Lotterywest Computing & Communications Acceptable Use Policy

Lotterywest Confidentiality Agreement

Lotterywest Mobile Device Allocation Policy Standard

Operating Environment (SOE) Process

Public Sector Commissioner's Circular 2009-30

Managing Government Intellectual Property

Public Sector Management Act 1994

## Fraudulent and Corrupt Behaviour

### Board statement on Fraud and Corruption

The Lotterywest Board is committed to a culture of honesty, openness and fairness. The Board has zero tolerance for fraud and corruption.

Fraud and corruption control management is an essential part of effective corporate governance and builds upon the need for transparent and accountable processes that minimise the risks of fraudulent and corrupt behaviour.

Lotterywest's Fraud and Corruption Control Policy establishes the framework for preventing, identifying, reporting and effectively dealing with fraud and other forms of corruption.

This framework ensures continuing organisational integrity and transparency in all activities at Lotterywest consistent with its values, code of conduct and the law.

### What does Lotterywest expect from its employees?

- **We will not engage** in fraud or corruption.
- **We will report** fraudulent or corrupt behaviour.
- **We will report** breaches of the Lotterywest Code of Conduct.

### Questions to identify fraudulent or corrupt behaviour:

- Am I engaging in an intentional act designed to use or commit funds inappropriately?
- Am I using my influence to procure a benefit for myself or another person contrary to Lotterywest's interests and those of its stakeholders?
- Am I in receipt of any benefit from an external party to influence my decision making?
- Am I using my position at Lotterywest for personal gain or to cause detriment to another person?
- Am I acting contrary to the public interest?
- Do I have an undisclosed personal or economic interest in a matter that could influence my professional role?

### Relevant Legislation, Regulation and Policy

- Corruption and Crime Commission Act 2003
- Criminal Code
- Department of Finance Procurement Practice Guide
- Financial Management Act 2006
- Lotterywest Conditions of Access Statement
- Lotterywest Discipline Policy
- Lotterywest Financial Management Manual
- Lotterywest Fit for Work Policy
- Lotterywest Fraud and Corruption Control Policy
- Lotterywest Gifts Benefits Hospitality & Invitations Policy
- Lotterywest Performance Management Policy
- Lotterywest Risk Management
- Framework Lotterywest Sub-Standard Performance Policy
- Lotterywest User Access and Password Management Procedure
- Public Sector Management Act 1994
- Playing Lotterywest Games by Staff and Closely Associated Persons Policy

## Use of Public Resources

### What does Lotterywest expect from its employees?

- **We are accountable** for official expenditure.
- **We use Lotterywest resources efficiently and effectively.** This includes office facilities and equipment, vehicles, cab charge vouchers and corporate credit cards.
- **We follow legislation and procurement policies** to engage contractors and suppliers.
- We only use corporate credit cards for **work-related expenditure.**
- **We will not use office time or resources for personal gain,** financial or otherwise.
- **We will adhere to Lotterywest policies and guidelines** in the use of computing and communication facilities, and will use these resources in a responsible and practical manner.
- **We will ensure that all travel is for official purposes** only when necessary and consistent with Government policy.

### Decision making questions for use of public resources:

- Have I considered all relevant policies and procedures on the use of this resource?
- Is it for official purposes or within 'acceptable use' guidelines as outlined in Lotterywest or State Government policies?
- Is it the most efficient and effective use of the resource to obtain the desired outcome?
- Would it stand up to public scrutiny?

## Relevant Legislation, Regulation and Policy

Copyright Act 1968

Corruption and Crime Commission Act 2003

Lotterywest Discipline Policy

Financial Management Act 2006

Lotterywest Access to Lotterywest Computer Rooms Procedure

Lotterywest Computing & Communications Acceptable Use Policy

Lotterywest Fit for Work Policy

Lotterywest Gifts Benefits Hospitality & Invitations Policy

Lotterywest Mobile Device Standard Operating Environment Process

Lotterywest Remote Access and Mobile Computing Policy

Public Sector Commissioner's Guide to Procurement and Management of Government Office Accommodation

Public Sector Commissioner's Guidelines for Official Travel

Public Sector Commissioner's Guidelines on Expenditure on Official Hospitality

Public Sector Management Act 1994

State Supply Commission Act 1991 and State Supply Commission Policies

## Record Keeping and Use of Information

### What does Lotterywest expect from its employees?

- We will record our actions and decisions to ensure transparency in decision making.
- We will ensure the secure storage of sensitive or confidential information.
- We will ensure compliance with Lotterywest's record keeping plan and Government policies.
- We will ensure that personal information is accurate, complete, up to date and not misleading.
- We will, where appropriate, share information to encourage efficiency and creativity.

### Decision making questions for record keeping and use of information:

- Have I adequately recorded information, to include decisions and actions taken?
- Have I followed Lotterywest's record keeping plan and any other relevant policies and procedures on record keeping and use of information?
- Am I using the most secure and appropriate way to record and store this information?
- Would my record keeping practices stand up to public scrutiny?

### Relevant Legislation, Regulation and Policy

Copyright Act 1968, Commonwealth of Australia

Corruption and Crime Commission Act 2003

Criminal Code Sections 81, 85 and 424 regarding the unauthorised disclosure, falsification and fraudulent use of records

Financial Management Act 2006 Lotterywest

Freedom of Information Act 1992

Lotterywest Business Continuity Plan Lotterywest

Communication Guidelines Lotterywest Computing & Communications

Acceptable Use Policy

Lotterywest Confidentiality Statement

Lotterywest Disaster Recovery Plan

Lotterywest Information Classification Policy

Lotterywest Information Management Policy

Lotterywest Information Security Policy

Lotterywest Record Keeping Policy Lotterywest Recordkeeping Plan

Public Sector Management Act 1994 (section 9(b))

State Records Act 2000 and State Records Principles and Standards 2002

## Conflicts of Interest, Gifts, Benefits and Hospitality

### What does Lotterywest expect from its employees?

- **We will act** impartially and not receive personal or financial gain from our official duties.
- When conflicts of or perceived conflicts of interests arise, **we will ensure** they are declared and managed carefully in the public interest.

Situations that may give rise to a conflict of interest include:

- The receipt of gifts, benefits or hospitality.
- Relationships with people and stakeholders that go beyond the level of a professional working relationship.
- Personal financial interests in work matters or being aware of friends or relatives with such an interest.
- Shareholdings or other interests held by employees in a company or business directly, or as a member of another company or partnership, or through a trust.
- Outside employment, including voluntary roles, appointments or directorships, whether remunerated or not.
- If a conflict does arise, **we will immediately** advise and seek guidance from our line manager as to the best way to manage the situation.

### Relevant Legislation, Regulation and Policy

Administrative Instruction: Fees, Rewards and Gratuities Corruption & Crime Commission Act 2003 (section 4,

Misconduct)

Criminal Code – Chapter X111

Electoral Act 1907

Financial Management Act 2006

Information Management Policy

Lotterywest Computing & Communications Acceptable Use Policy

Lotterywest Contracts and Purchasing Policy

Lotterywest Discipline Policy

Lotterywest Gift Giving/Receiving Policy

Lotterywest Grievance Policy

Lotterywest Information Security Policy

Lotterywest Management of Sub-standard

Performance Policy

Lotterywest Performance Management Policy

Lotterywest Purchasing Card Policy

Lotterywest Record Keeping Policy

Public Sector Management Act 1994 (including section 102 on external employment)

State Supply Commission Act 1991 and State Supply Policies

## Reporting Suspected Breaches of the Code

### What does Lotterywest expect from its employees?

- We will report any suspected wrongdoing and breaches of the Code of Conduct.

If you have any concerns about whether your actions, or the actions of a colleague, meet the Code of Conduct standards, you can:

1. Talk to your line manager, General Manager, the CEO or General Manager Corporate Services.
2. Contact the Senior Manager People and Culture.
3. Use the Public Interest Disclosure process, which includes anonymous reporting.

Employees can be confident that reported suspected breaches of the code will be taken seriously, treated confidentially and considered in a timely manner.

### Relevant Legislation, Regulation and Policy

Criminal Code – Chapter X111

Lotterywest Discipline Policy Lotterywest Performance and Development Plans

Lotterywest Grievance Policy

Lotterywest Sub-Standard Performance Policy Public Interest Disclosure Act 2003

Public Sector Management Act 1994