CODE OF CONDUCT

Purpose

This policy sets out the standards of behaviour expected of everyone who works for, represents, or acts on behalf of Shine Bright EYM. It supports safe, respectful and ethical behaviour and practice, and reinforces Shine Bright values and culture.

The Code of Conduct;

- Supports behaviour aligned to The Shine Bright Way and organisational values
- Defines expected standards of behaviour across all roles and locations
- Promotes a workplace free from discrimination, bullying and harassment
- Guides professional interactions and psychological safety
- Provides a reference point (along with related policies) when conduct issues arise

2. Scope

This policy applies to all educators and employees, including senior leadership and executives, Board members, contractors, consultants and volunteers. It applies whenever a person is working onsite or offsite, attending a work-related activity or event, travelling, representing Shine Bright EYM, or when conduct may impact children's safety, workplace culture or the organisation's reputation.

3. Principles / rationale

Shine Bright strives to be a values-led organisation (see Appendix 1) and as such, all employees are expected to act in accordance with each of our values as described below and in ways that proactively demonstrate the purpose of this policy:

Integrity: We act ethically and with honesty in all situations. We are accountable for our actions and take responsibility for children in our care knowing the significant impact that we can have on their learning and life.

Curiosity: We act with curiosity because it leads to innovation through asking questions, wondering and taking rational risks without rushing to conclusions.

Courage: We are open to being questioned and seek feedback. We move toward challenges, rather than avoiding them. We are committed to being upstanders, not bystanders, especially when it comes to enacting our Values.

Clarity: We act with clarity by working and communicating in a way that is easy to understand. This brings deeper meaning and transparency to the words and ideas that we share with one another, our families, and children. Clarity makes advocacy and connection more powerful and helps us to honour children's voices and reflect on our practice.

Respect: We act with respect in all exchanges with all people, acknowledging differences and being inclusive of diverse needs, inputs and perspectives. We honour the cultures, histories and contributions of First Nations People's and the wide range of cultures within our community.

4. Policy statement

The below categories of behaviour and ways of working support a safe and respectful workplace and adherence to these behaviours will uphold Shine Bright's reputation and operational efficiency and integrity. The following categories of behaviour, and listed examples (not exhaustive) must be upheld.

Child safety and duty of care: protect children from harm, act on concerns immediately, and comply with child-safe standards, related policies, legal and reporting obligations.

Professional conduct: perform duties competently, collaboratively and support team members. Maintain required staff records/registrations/checks, and follow lawful as well as reasonable directions from colleagues, managers or leadership.

Appropriate behaviour: Embrace and enact Shine Bright values and the Shine Bright Way philosophy and adopt a zero-tolerance approach toward discrimination, bullying, harassment and victimisation.

Privacy, confidentiality and intellectual property: access, use and share information only as needed for your role and keep accurate records. All work created during working hours or developed out of work hours for work purposes, is considered Shine Bright intellectual property and remains the property of Shine Bright EYM unless otherwise agreed in writing.

Good governance: act within delegated authority and role responsibilities, declare and manage conflicts of interest, and use organisational resources responsibly to avoid fraud and corruption. This includes adhering to financial approvals, procurement decisions, staffing decisions and seeking clarification if unsure. Also includes considering personal, financial or other interests that could

influence (or appear to influence) decisions in your role.

Accountability: raise and report concerns, cooperate with investigations, and support a culture of continuous improvement. This includes promptly advising line managers of any change in circumstances that may affect your ability to perform your role safety, lawfully and professionally or that may impact children's safety.

5. Roles and responsibilities

Role	Responsibilities
Board of directors **DATE APPROVED:** September 2026	Policy approver, monitor compliance, role model and uphold values and ensure CEO accountability.
CEO	Monitor compliance, role model and uphold values and ensure Executive accountability.
People & Culture Manager	Maintain policy, provide guidance, coordinate reviews and communicate policy organisationally.
Senior Leadership Team, Early Years Advisors, P& C Coordinators	Ensure staff awareness, monitor compliance.
All staff	Follow policy and embrace policy principles, complete required training, report issues.
People & Culture team	Lead disciplinary action if required.

7. Compliance and breaches

Everyone covered by this policy must comply with it and report suspected or actual breaches as soon as practicable to a line manager, senior leader, or via relevant complaint/grievance and reporting pathways. Reports will be handled sensitively and, where required, confidentially. Victimisation of anyone raising a concern in good faith will not be tolerated.

Breaches may result in action proportionate to the seriousness of the conduct, which may include coaching, training, formal warnings, changes to duties, suspension or termination of employment/engagement. Shine Bright EYM will apply fair and lawful processes and will meet any mandatory reporting obligations to relevant authorities where required.

6. Exceptions

There are no exceptions to child safety and legal reporting requirements. Reasonable management action carried out in a fair way (e.g., performance improvement or direction to comply with safety or behavioural standards) does not constitute bullying. Where this policy appears to conflict with a law, regulation or industrial instrument, the higher standard applies and advice should be sought from a senior leader. Where necessary, external advice may be considered.

8. Related documents / policies / legislation

Policies

- Child Safe Environment and Wellbeing
- Compliments and Complaints
- Delivery and Collection of Children
- Inclusion and Equity
- Interactions with Children
- Occupational Health and Safety
- Privacy and Confidentiality
- Rest and Sleep
- Safe Use of Digital Technologies and Online Environment
- Staffing
- Tobacco, Alcohol and other Drugs

Legislation

- Charter of Human Rights and Responsibilities Act 2006 (Vic)
- Child Safe Standards (Vic)
- Children, Youth and Families Act 2005 (Vic)
- Child Wellbeing and Safety Act 2005 (Vic)
- Disability Discrimination Act 1992 (Cth)
- Early Childhood Australia's Code of Ethics (2016)
- Education and Care Services National Law Act 2010: Sections 166, 167, 173, 174
- Education and Care Services National Regulations 2011: Regulations 83, 155, 156, 157, 168, 170, 171, 174, 175, 176
- Equal Opportunity Act 2010 (Vic)
- Fair Work Act 2009 (Cth)
- Fair Work Regulations 2009 (Cth)

- National Quality Standard, Quality Area 4: Staffing Arrangements
- Occupational Health and Safety Act 2004
- Occupational Health and Safety Regulations 2017
- Racial Discrimination Act 1975
- Racial and Religious Tolerance Act 2001 (Vic)
- Sex Discrimination Act 1984 (Cth)
- Victorian Institute of Teaching the Victorian Teaching Profession Code of Conduct
- Victorian Institute of Teaching the Victorian Teaching Profession Code of Ethics
- Australian Charities and Not for Profits Commission (ACNC)
- Australian Institute of Company Directors (AICD)

APPENDIX 1

Values in action

INTEGRITY	•We proactively implement proven practice, regulatory compliance, policies and procedures •We believe that the standard you walk past is the standard you accept •We enact the Shine Bright way with all colleagues, children, families and community
CURIOSITY	•We critically reflect and seek continuous improvement in all that we do. •We avoid assumptions and habit and try new things. •We ask questions to understand rather than to respond.
COURAGE	•We collaborate with families about sensitive issues with empathy and clarity. •We speak up when a colleague or child's needs or rights aren't being met, even if it feels uncomfortable. •We embrace authenticity and vulnerability to deepen trust and genuine connection.
CLARITY	•We understand that words matter and that clear communication helps people to value what we do and how we do it. •We use data and evidence to guide decision-making and to bring clarity to our motivations. •We communicate with versatility to meet the needs of our diverse community
RESPECT	•We earn respect by being respectful. •We actively listen and respect people's differing experiences and capabilities and value their opinions. •We remove judgement where appropriate and use empathy and acceptance to support our community.