

# Financial Code of Conduct Policy

## Section 1 - Purpose

(1) This Financial Code of Conduct sets out the standards of behaviour and conduct expected from Melbourne Polytechnic staff in relation to financial matters. If any of the provisions contained within this code are not fully understood, staff should seek clarification from the Chief Financial Officer.

## Section 2 - Principles

(2) Melbourne Polytechnic acknowledges the responsibility it has for the administration of public funds. In accordance with the Code of Conduct for Victorian Public Sector Employees, staff members are to observe the highest standards of integrity in financial matters and comply with the requirements of relevant financial management legislation, policies and procedures.

(3) Staff members are expected to act at all times in the best interests of Melbourne Polytechnic.

(4) Staff members who have direct responsibility for financial transactions, for example the ordering of goods and services on behalf of Melbourne Polytechnic, must comply with Melbourne Polytechnic policies and procedures and applicable legislation.

(5) Melbourne Polytechnic may apply its disciplinary procedures against staff members who are in breach of this code. Instances of non-compliance with this code may be reported to the Board, the Chief Executive Officer (CEO), Deputy CEO, Chief Financial Officer or Director of Corporate Governance. Melbourne Polytechnic arrangements for the prevention and detection of fraud and corruption will be kept under timely review, and all suspected irregularities will be investigated.

## Section 3 - Scope

(6) This code of conduct applies across Melbourne Polytechnic to all staff members, including Melbourne Polytechnic employees and relevant contractors and consultants.

## Section 4 - Specific information

### Financial accountability

(7) Staff members must ensure that in financial matters, including the handling of monies, they observe Melbourne Polytechnic policies and procedures and relevant legislative and regulatory requirements and that there is full accountability in relation to any advice or transaction in which they may be involved.

### Fair dealing

(8) Decisions must not be improperly influenced by private interests or relationships. Staff members must not use their powers at work to provide a private benefit to themselves, their family, friends or associates.

## **Confidentiality**

(9) During the period of their work with Melbourne Polytechnic and for anytime thereafter, staff members of Melbourne Polytechnic are expected to maintain and respect the confidentiality of financial information and other matters of a financial nature that they come across during the course of their work with Melbourne Polytechnic.

## **Private interests**

(10) Melbourne Polytechnic staff members are required to maintain strict separation between work-related and private financial matters and only use or authorise the use of public financial resources or facilities for work-related purposes.

(11) A conflict of interest occurs where there is conflict between the public duty and private interests of a public official. A conflict can be actual, potential or perceived. Conflicts of interest must be handled in accordance with the [Conflict of Interest Policy](#).

(12) Staff members must not influence purchasing decisions in which they have a private interest.

(13) Staff members must not misuse Melbourne Polytechnic property, information or position, or opportunities arising from these for private gain or to compete with Melbourne Polytechnic's interests.

## **Financial inducements, gifts, benefits and hospitality**

(14) Staff members must comply with the [Gifts, Benefits and Hospitality Policy](#).

## **Tendering and procurement**

(15) All tendering and procurement activity must be compliant with Melbourne Polytechnic policies and procedures.

## **Use of Melbourne Polytechnic property, facilities or equipment**

(16) Staff members often have access to Melbourne Polytechnic property, including facilities and equipment.

(17) Staff members are required to use Melbourne Polytechnic facilities and equipment for their proper purpose, maintain them properly and take reasonable precautions against theft of Melbourne Polytechnic equipment.

(18) Melbourne Polytechnic facilities and equipment may be used on a minimal basis for a demonstrated private nature provided that:

- a. Use is approved by the Senior Manager responsible for the area;
- b. A register of private use is maintained and kept current for any items of equipment borrowed; and
- c. Use is not for an individual's commercial gain.

## **Use of Melbourne Polytechnic Funds**

(19) The main criterion for use of Melbourne Polytechnic funds is to support Melbourne Polytechnic's business purposes. The following guidelines assist Melbourne Polytechnic Schools and Departments in their interpretation of the acceptable use of Melbourne Polytechnic funds. The list of examples is not exhaustive. For further information or guidance, please contact the Chief Finance Officer.

(20) Examples of acceptable use of Melbourne Polytechnic funds:

- a. Goods and services directly related to the operations of Melbourne Polytechnic;
- b. Reimbursement for pre-approved out of pocket business expenses;
- c. Approved professional development for staff.

(21) Note, as a general rule the following are not considered as funds used for Melbourne Polytechnic purposes:

- a. Staff gifts, unless these are consistent with the [Gifts, Benefits and Hospitality Policy](#) and are approved in accordance with the relevant section of the [Delegation of Authority Policy](#);
- b. Department morning teas / birthdays.

(22) Melbourne Polytechnic has the right and responsibility to withhold approval of expenses that contravene Melbourne Polytechnic requirements or policies.

### **Use of Credit Cards**

(23) Melbourne Polytechnic credit cards may be issued from time to time to the CEO and other direct employees of Melbourne Polytechnic.

(24) Credit card issuing and expenditures require approval as per the [Delegation of Authority Policy](#).

(25) Credit cards are to be used for Melbourne Polytechnic business purposes only, and in accordance with Melbourne Polytechnic policies and procedures, including the Personal Expenses Schedule below. Melbourne Polytechnic credit cards do not accrue reward points.

### **Expense reimbursements**

(26) Melbourne Polytechnic will only reimburse business expenses, which are expenditures incurred for Melbourne Polytechnic business purposes and for the benefit of Melbourne Polytechnic. Private expenses are the responsibility of the staff member and will not be reimbursed. The Personal Expenses Schedule below outlines common types of business and private expenses.

## **Section 5 - Breaches**

(27) Breaches of this code of conduct may lead to action under relevant performance management or misconduct processes.

(28) Individuals who consider that financial conduct within Melbourne Polytechnic may be in breach of this code of conduct should speak up and notify their manager, or alternatively the Chief Financial Officer, the Director Corporate Governance and General Counsel, the Chief Operating Officer or the Chief Executive Officer.

(29) Melbourne Polytechnic will take action, including possible disciplinary action, against individuals who discriminate against or victimise those who speak up in good faith.

## **Section 6 - Definitions**

(30) GSERP: stands for Government Sector Executive Remuneration Panel. In the context of the policy, GSERP employees are employed under an executive contract.

(31) Staff members: For the purposes of this code, 'staff members' include Melbourne Polytechnic employees and contractors and consultants (including contractors or consultants engaged through an employment agency) where the contractors or consultants:

- a. Supervise Melbourne Polytechnic employees;
- b. Undertake work that is of a similar nature to the work undertaken by Melbourne Polytechnic employees at a premise or location generally regarded as a Melbourne Polytechnic workplace; or

- c. Use or have access to Melbourne Polytechnic’s resources or information that are not normally accessible or available to the public.

## Section 7 - Responsibility and Accountability

| Task  | Responsibility |
|---|----------------|
| Be familiar with and act in accordance with this Financial Code of Conduct  | Employees      |
| Ensure contractors or consultants engaged in or by Melbourne Polytechnic (including contractors or consultants engaged through an employment agency) comply with this Code of Conduct and relevant policies and procedures, where the contractors or consultants: <ul style="list-style-type: none"> <li>• Supervise Melbourne Polytechnic employees;</li> <li>• Undertake work that is of a similar nature to the work undertaken by Melbourne Polytechnic employees at a premise or location generally regarded as a Melbourne Polytechnic workplace; or</li> <li>• Use or have access to Melbourne Polytechnic’s resources or information that are not normally accessible or available to the public</li> </ul> | Employees      |

## Section 8 - Supporting Documents and Templates

(32) Relevant Melbourne Polytechnic policies and procedures:

- [Conflict of Interest Policy](#)
- [Contract Management Policy](#)
- [Credit Cards Procedure](#)
- [Delegation of Authority Policy](#)
- [Fraud and Corruption Prevention Policy](#)
- [Code of Conduct Policy](#)
- [Procurement Policy](#)

(33) Relevant legislation and regulatory requirements:

- [Code of Conduct for Directors of Victorian Public Entities](#)
- [Standing Directions of the Minister for Finance 2018](#)

## Section 9 - Personal Expenses Schedule

### Business expenses vs private expenses

(34) This Schedule does not guarantee the payment or reimbursement of any expense. All payments are subject to relevant Melbourne Polytechnic policies, including approval requirements in accordance with the [Delegation of Authority Policy](#).

| Expenditure                        | Allowable?   |
|------------------------------------|--|
| Airline frequent flyer memberships | NO: These are private expenses.<br>Use of frequent flyer points is subject to the <a href="#">International and Domestic Travel Policy</a> . |
| Airport lounge memberships         | YES: Subject to the <a href="#">International and Domestic Travel Policy</a> .   |

| Expenditure   | Allowable?  |
|---|---|
| Alcohol   | Subject to the <a href="#">Gifts, Benefits and Hospitality Policy</a> :<br>YES: May be allowed as part of an official business purpose if alcohol is incidental to the purpose and if food is also served. May also be provided as part of marketing Melbourne Polytechnic products. Must be served / consumed responsibly.<br>NO: Staff are not permitted to bring home alcohol purchased using Melbourne Polytechnic funds.<br>NO: Social events, even when organised for groups of MP staff. |
| Clothing  | Clothing required by Melbourne Polytechnic will normally be purchased using approved procurement channels.<br>NO: Outfit hire for formal or academic functions.<br>NO: Clothing for sporting or recreational functions.   |
| Computer hardware, software, and peripherals (e.g. keyboard, mouse) | If for business use and purchased through, or approved by, the DTE Department. Smaller items are generally purchased through the approved stationery supplier.  |
| e-tags / tolls  | YES: Costs incurred for Melbourne Polytechnic business purposes including between campuses.<br>NO: Travel between home and principle place of work. This is a private expense.  |
| Entertainment   | Subject to the <a href="#">Gifts, Benefits and Hospitality Policy</a> :<br>YES: Meals with external parties if necessary for Melbourne Polytechnic business purposes (costs must be reasonable and proportionate to the benefits obtained for Melbourne Polytechnic).<br>YES: Modest catering for business workshops, business meetings or MP-approved professional development activities; costs must be reasonable.<br>NO: Other staff meals, coffees, birthdays, etc.                        |
| Fines   | NO: All fines for the breach of any rule or regulation (including those incurred whilst on Melbourne Polytechnic business) are the private responsibility of the staff, student, contractor, consultant or associate.   |
| Furniture and related items   | NO: All furniture-related items are to be obtained through the Facilities and Assets Department.<br>OHS items are addressed below.  |
| Gifts   | Subject to the <a href="#">Gifts, Benefits and Hospitality Policy</a> .<br>Employee gifts (bereavement, health, special recognition, birth, illness) are subject to the <a href="#">Delegation of Authority Policy</a> .<br>NO: Employee gifts other than those approved per the <a href="#">Delegation of Authority Policy</a> .   |
| Gym / fitness / golf / sporting etc memberships                     | NO: These are private expenses.   |
| Laundry   | YES: Reasonable costs while travelling on business trips, subject to the <a href="#">International and Domestic Travel Policy</a> .   |
| Magazine / periodical / journal / website subscriptions             | These should be obtained through Melbourne Polytechnic's library.   |
| Meals   | See Entertainment section above.  |
| Minibar, liquor, in-house movies, cigarettes                        | NO: These are private expenses, even if incurred while travelling on Melbourne Polytechnic business. Refer to the <a href="#">International and Domestic Travel Policy</a> .  |
| OHS (Occupational Health and Safety) items                          | Generally no.<br>YES: If the need has been assessed, and there has been approval from the Manager OH&S, WorkCover and Employee Wellbeing and approval from the relevant School / Department.  |
| Parking   | YES: Parking when required for business purposes, other than on a Melbourne Polytechnic campus.<br>NO: Per the Car Parking Policy, Melbourne Polytechnic funds are not to be used for the purchase of Melbourne Polytechnic parking permits or Pay As You Go parking.   |

| Expenditure   | Allowable?   |
|---|--|
| Petrol / fuel / mileage                                     | For travel between places of work required for business purposes, staff are encouraged to use Melbourne Polytechnic pool vehicles. In situations where private vehicles are used, petrol / fuel / mileage may be claimed subject to travel and use of vehicle policies and procedures.<br>NO: Travel between home and principle place of work. This is a private expense.  |
| Professional associations / memberships                     | YES: For non-GSERP employees, subject to the Professional Development policies / procedures / guidelines.<br>NO: For GSERP employees.  |
| Professional development                                    | YES: For employees, subject to Professional Development policies / procedures / guidelines.  |
| Public transportation                                       | YES: Staff who are required to work from an alternate work location may be reimbursed for the cost of public transport.<br>NO: Travel between home and Melbourne Polytechnic campuses. This is a private expense.  |
| Relocation expenses   | Subject to the relevant People and Culture Policy.   |
| Safety / protective clothing or equipment                   | Clothing or equipment required by Melbourne Polytechnic will normally be purchased using approved procurement channels.<br>NO: Clothing or equipment that is for general use, e.g. reading glasses, is a private expense.  |
| Taxis   | For travel between places of work required for business purposes, staff are encouraged to use Melbourne Polytechnic pool vehicles. In situations where all other transport means (e.g. Melbourne Polytechnic pool vehicles, public transport) have been exhausted or when taxi use is safer or more cost-effective, use Cabcharge vouchers or taxi e-tickets where possible.   |
| Tickets to entertainment events (including sporting events) | Generally no. Any exceptions must be for a business purpose, have prior CEO approval, and meet the principles and requirements of the <a href="#">Gifts, Benefits and Hospitality Policy</a> .   |
| Tips / gratuities   | Per the 2016 <a href="#">Standing Directions of the Minister for Finance 2018</a> :<br>YES: If outside Australia for business purposes, to the minimum extent expected per common practice in the relevant country.<br>NO: Tips or gratuities in Australia.  |
| Travel  | Subject to the <a href="#">International and Domestic Travel Policy</a> :<br>YES: For official business purposes.<br>NO: The following are private expenses <ul style="list-style-type: none"> <li>• The travel costs of a spouse / partner / dependant</li> <li>• Additional costs incurred due to any private travel including leave taken while on business travel</li> <li>• Travel between home and normal place of work</li> <li>• Upgrade costs (including for flights and accommodation).</li> </ul> |
| Uber  | Uber is currently not approved for use for Melbourne Polytechnic business purposes.  |
| Vehicle use (private or hire)                               | For travel between places of work required for business purposes, staff are encouraged to use Melbourne Polytechnic pool vehicles. In situations where private or hire vehicles are used, costs may be claimed subject to travel and use of vehicle policies and procedures. See Petrol / fuel / mileage section above.  |

## Status and Details

|                                      |   |
|--------------------------------------|---|
| <b>Status</b>                        | Current   |
| <b>Effective Date</b>                | 18th October 2017   |
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| <b>Approval Date</b>                 | 18th October 2017   |
| <b>Expiry Date</b>                   | Not Applicable  |
| <b>Policy Owner</b>                  | Joseph Santiago<br>Executive Director Finance, Reporting, Assurance and Marketing |
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