



# Our Code of Conduct

Updated June 2023

# Introduction

Lotterywest and Healthway are wonderful places to work. We are organisations which really make a difference. Our work touches all Western Australians in their lifetimes through the opportunities and value we contribute to the community.

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

This Code of Conduct provides everyone with a clear guide on workplace behaviour, and the ethical basis of our operations. 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.



Ralph Addis  
Chief Executive Officer  
Lotterywest and Healthway

# Statement of Compliance from the Lotterywest and Healthway Boards

Both the Lotterywest and Healthway Boards are committed to a culture of honesty, openness and fairness. The Boards oversee corporate governance which provides principles and guidance for all Lotterywest and Healthway staff and management. The framework ensures continuing organisational integrity and transparency in all activities, consistent with our Values, this Code of Conduct and the law.

The Boards are strongly committed to the Public Sector Commission's Integrity Strategy for WA Public Authorities 2020-2023. Integrity is highly relevant to Lotterywest and Healthway, as both entities manage significant government and public money, commercial agreements and discretionary grants. Fraud and corruption can easily compromise integrity which is why the Boards have zero tolerance for fraud and corruption.

Fraud and corruption control management remains an essential part of effective corporate governance building on the need for transparent and accountable processes. The Boards' Risk Committees oversee control management and ensure a continuing high standard of compliance practice for both Lotterywest and Healthway. This Code of Conduct is underpinned by:

## Our 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.
- **Confident:** 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:** We provide clarity of expectation, consistency of delivery and quality outcomes.
- **Adaptable:** We know our business and our environment. We make the most of opportunities and choose when and how to change.

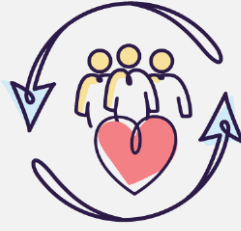
## Our Code of Ethics

The Code of Ethics reflects the Public Sector Code of Ethics which sets out the minimum standards of conduct and integrity for all public sector employees based on the following principles:



### 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.

## Accountable and Ethical Decision-Making Framework

The Western Australian Public Sector Commission oversees the public sector. The Commission's framework for accountable and ethical decision-making 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?

## 1. Personal behaviour

What does the organisation 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**, considering all available information, legislation and our policies and procedures.
- We **comply with all our policies and procedures.**
- We **take responsibility** for our actions and decisions.
- We are **always professional.**
- We are **fit for work.**
- We do not **harass, bully or discriminate.**
- We support a **harmonious, safe and productive work environment.**
- We comply with our **work, health and safety obligations.**

Decision making questions for personal behaviour:

- Are my actions legal and consistent with government policies and Codes of Conduct?
- Do I meet the minimum standards of conduct and integrity expressed in the Code of Conduct?
- What impacts could my actions, or lack of action, have on the organisation, other staff, community, customers, family and friends?
- Would my actions stand up to public scrutiny?
- Should I discuss this with someone else?
- Do I have an undisclosed personal or economic interest in a matter that could influence my professional role?

## 2. Communication and official information

What does the organisation expect from its employees?

- We maintain appropriate **confidentiality and privacy** of all official information.
- We **do not use official information for personal or commercial gains** for ourselves or others or to cause harm.
- We **do not publish or make public comment or release information** about Lotterywest or Healthway business unless approved.
- We **do not speak for Lotterywest or Healthway** unless approved.
- We adhere to **Government policy and protocols as well as to internal policies** and directives regarding communications.

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 guiding release of this information?
- What is the nature of the information?
- Could it be considered sensitive?

### 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?
- 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?

### 3. Fraudulent and corrupt behaviour

What does the organisation expect from its employees?

- We will **not engage in fraud or corruption.**
- We will **report any actual or suspected fraudulent or corrupt behaviour.**
- We will **report breaches of the 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 the organisation's interests and those of its stakeholders?
- Am I in receipt of any benefit from an external party seeking to influence my decision making?
- Am I using my position for personal gain or to cause detriment to another person?
- Am I acting contrary to the public interest?

### 4. Use of public resources

What does the organisation expect from its employees?

- We are **accountable** for all expenditure.
- We use **resources efficiently and effectively.** This includes office facilities, equipment, technology and vehicles.
- We will report all **damage** to, or loss of, systems, property or equipment.
- We follow **legislation and procurement policies** to engage contractors and suppliers.
- We will 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 policies and guidelines** in the use of computing and communication facilities and will use these resources in a responsible manner.
- We will ensure that all **travel is for official purposes**, only undertaken when necessary, and consistent with Government policy.

Decision making questions for use of public resources:

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

## 5. Record keeping and use of information

What does the organisation 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 the record keeping plan, data governance guidelines** and Government policies.
- We will ensure the **integrity of records** is maintained and records are not altered, damaged or destroyed.
- We will ensure that **our personal information** is accurate, complete, up to date and not misleading.
- We respect the **privacy of personal information** and will only use such information for appropriate and approved purposes.
- We will, only where appropriate, **share information** to encourage efficiency and transparency.

Decision making questions for record keeping and use of information:

- Have I adequately recorded information, including decisions and actions taken?
- 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?

## 6. Ethical supply and promotion of lottery games

Lotterywest exists to enhance the quality of life of all Western Australians. We are committed to ensuring that playing our games does not cause harm to individuals or communities. We respect the autonomy of our players to choose how and when they play, we also commit to providing our players with safe games and environments as well as the knowledge and tools to make safe and informed play choices.

What does the organisation expect from its employees?

- We live Lotterywest's Player Safety Principles.
- We actively seek to reduce gambling risk to the public.
- We are mindful to identify potential gambling risks and problematic play.
- We have completed the latest mandatory Player Safety Training Modules and refresher materials.
- We constantly strive to improve and aspire to leadership in player and retailer safety.



## 7. Conflicts of interest, gifts, benefits and hospitality

What does the organisation expect from its employees?

- We will act impartially.
- We will not receive personal or financial gain from our official duties.
- When potential, actual or perceived conflicts of interests arise, we will declare the conflicts and record them in the Conflict of Interest Register.
- We will immediately disclose conflicts to our managers and seek guidance on the best way to manage those conflicts.
- We will ensure all conflicts are carefully managed in the public interest.
- All gifts, benefits and hospitality will be declared and managed in accordance with our policies.
- We will not engage or be involved in bribery in the course of our official duties.

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, such as a relative being a shareholder or director of a supplier or a friend's involvement with a grant recipient.
- Shareholdings or other interests in a company or business (directly, or as a member of another company or partnership, or through a trust) engaging with the organisation, such as retailers, contractors or grant recipients.
- Outside employment, including voluntary roles, appointments or directorships, whether remunerated or not.

## 8. Reporting suspected breaches of this Code

What does the organisation expect from its employees?

- We will report any suspected wrongdoing and breaches of this Code of Conduct.
- We will treat reported breaches of this Code seriously, confidentially and promptly.
- We will support those who speak up about misconduct or integrity and will not tolerate reprisal action.

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

- Talk to your line manager, General Manager, the CEO or the General Manager Corporate Services.
- Contact the Director People and Culture.
- Use the Faircall service to report breaches, including the option to report anonymously
- Use the Public Interest Disclosure process, which includes anonymous reporting.
- Use the CCC or the PSC disclosure process, consistent with guidelines.

## 9. Consequences of breaches of this Code

- Lotterywest and Healthway will undertake disciplinary action against anyone who breaches this Code of Conduct.
- Depending on the severity of the breach, the disciplinary action taken may range from informal warnings, performance management, formal warnings, suspension from duties, or termination of employment.
- Illegal activities may also be reported to the relevant authority.
- Any person who sanctions a breach of this Code by another person, or who is aware of a breach of this Code by another person and, who without good reason, fails to report or take appropriate remedial action in relation to that breach, may also be subject to disciplinary action.

Legislation / Government Policy:	Applicable section								
	1	2	3	4	5	6	7	8	9
<a href="#">Administrative Instruction 711 Official Information</a>		✓			✓				
<a href="#">Administrative Instruction 728 Media and Public Communications</a>		✓							
<a href="#">Administrative Instruction 102 Official Communications</a>		✓							
<a href="#">Copyright Act 1968</a>		✓		✓	✓				
<a href="#">Corruption, Crime and Misconduct Act 2003</a>			✓	✓	✓		✓	✓	✓
<a href="#">The Criminal Code</a>	✓	✓	✓	✓	✓		✓	✓	✓
<a href="#">Disability Services Act 1993</a>	✓								
<a href="#">Equal Opportunity Act 1984</a>	✓								
<a href="#">Financial Management Act 2006</a>	✓		✓	✓	✓		✓		
<a href="#">Freedom of Information Act 1992</a>	✓				✓				
<a href="#">Lotteries Commission Act (1990)</a>						✓			
<a href="#">Premier's Circular 2021/02 - Guidelines for official air travel by Ministers, Parliamentary Secretaries and Government Officers</a>				✓					
<a href="#">Procurement Act 2020</a>				✓					
<a href="#">Public Interest Disclosure Act 2003</a>	✓		✓					✓	✓
<a href="#">Public Interest Disclosure Guidelines</a>	✓		✓					✓	✓
<a href="#">Public Sector Commission – Code of Ethics</a>	✓								
<a href="#">Public Sector Commission – Notifying Misconduct – A Guide for Principal Officers of Notifying Authorities</a>			✓					✓	✓
<a href="#">Public Sector Commissioner's Circular 2009/18 – Guidelines for Expenditure on Official Hospitality</a>				✓			✓		
<a href="#">Public Sector Commissioner's Instruction 8: Codes of Conduct and integrity training</a>	✓	✓	✓	✓	✓	✓	✓	✓	✓
<a href="#">Public Sector Management Act 1994</a>	✓		✓	✓	✓		✓	✓	✓
<a href="#">State Records Act 2000</a>	✓				✓				
<a href="#">State Records Principles and Standards 2002</a>					✓				
<a href="#">Western Australian Procurement Rules</a>				✓					
<a href="#">Western Australian Health Promotion Foundation Act 2016</a> [Healthway]		✓							

Public

Legislation / Government Policy:	Applicable section								
	1	2	3	4	5	6	7	8	9
<a href="#">Work, Health and Safety Act 2020</a>	✓								
<a href="#">Work, Health and Safety (General) Regulations 2022</a>	✓								

Policies / Frameworks / Plans:	Applicable section								
	1	2	3	4	5	6	7	8	9
Brand Guideline		✓							
Business Continuity Plan					✓				
Complaints Management Policy	✓								
Computing and Communications Acceptable Use Policy	✓			✓	✓				
Contracting and Purchasing Policy				✓			✓		
Lotterywest Confidentiality Agreement		✓							
Conflicts of Interest Policy			✓				✓		
Credit Card Policy				✓			✓		
Player Safety DigitalSafety Policy				✓	✓	✓			
Disaster Recovery for Records Plan					✓				
Discipline Policy	✓		✓	✓			✓	✓	✓
Player Safety Stakeholder Policy						✓			
Equity and Diversity Policy	✓								
Fit for Work Policy	✓								
Gifts Benefits and Hospitality Policy			✓	✓			✓		
Grievance Policy	✓							✓	✓
Information Protection and Classification Policy					✓				
Information Statement (Lotterywest and Healthway)					✓				
Information Systems Conditions of Access Statement (Lotterywest)				✓	✓				
Retailers' Player Safety Charter						✓			
Managing a Conflict of Interest Guideline							✓		
Performance and Development Plan	✓								
Player Safety Harm Minimisation and Support Referral Policy						✓			

Policies / Frameworks / Plans:	Applicable section								
	1	2	3	4	5	6	7	8	9
Playing Lotterywest Games by Staff and Closely Associated Persons Policy			✓						
Recordkeeping Plan					✓				
Records and Information Management Policy					✓				
Remote Access and Mobile Computing Policy				✓					
Player Safety Harm Minimisation Committee Terms of Reference						✓			
Player Safety Framework and Principles						✓			
Player Safety Policy for Staff (incl. Contracted Staff)						✓			
Player Safety Policy						✓			
Playing Lotterywest Games by Staff and Closely Associated Persons Policy						✓			
Player Safety Game Design Risk Assessment Policy						✓			
Player Safety Advertising Policy						✓			
Player Safety Education Policy						✓			
Player Safety Reporting and Monitoring Policy						✓			
Risk Management Policy			✓						
Substandard Performance Management Policy	✓		✓				✓	✓	✓
Travel Policy				✓					
Procedures:	Applicable section								
	1	2	3	4	5	6	7	8	9
Access to Lotterywest Secure Areas Procedure				✓					
Corporate Remote Access to Lotterywest Environments Procedure				✓					
Financial Management Manual			✓	✓					
Information Protection and Classification Procedure					✓				
Performance and Development Plan Procedure	✓								
Substandard Performance Management Guidelines and Procedures	✓		✓				✓	✓	✓

Policies / Frameworks / Plans:	Applicable section								
	1	2	3	4	5	6	7	8	9
User Access and Password Management Procedure			✓	✓					

Other Documents:	Applicable section								
	1	2	3	4	5	6	7	8	9
<a href="#">World Lottery Association Responsible Gaming Principles</a>						✓			