

Honouring the lives of our diverse community



Code of Conduct

2025

METROPOLITAN
CEMETERIES BOARD



Acknowledgement of country

The Metropolitan Cemeteries Board are proud to deliver our services from Whadjuk Noongar boodja. We acknowledge the traditional Custodians throughout Western Australia and recognise their continuing connection to their lands, families and communities. We pay our respects to Aboriginal and Torres Strait Islander people and cultures, and to Elders past, present and emerging.

Disclaimer: The Metropolitan Cemeteries Board (MCB) is continually updating its policies, procedures and guidelines (policy documents). All employees must familiarise themselves with the published policy documents until they are advised that an updated policy document has been implemented.

This publication is available in alternative formats upon request.

Reviewed: April 2025

Next Review Date: August 2026

Message from the CEO

As employees of the Metropolitan Cemeteries Board (MCB), we are entrusted to provide the Western Australian community with quality, dignified services at times when **compassion**, **connection**, and **integrity** are most needed. How we conduct ourselves, as individuals and team members impacts how we are perceived by the community and Government.

Ethical conduct is a non-negotiable at the MCB. Every person working for, with, or alongside us should know this. As public officers, our decisions, words, and actions are underpinned by the MCB values and the **Public Sector Code of Ethics'** standards of **integrity, impartiality, respect for others**, and **trust and accountability**.

Our Code of Conduct (the Code) builds on the Code of Ethics by describing how these standards apply to our work and setting the behaviours we should demonstrate and see every day. It reinforces our values and culture and supports us to consistently uphold our responsibilities.

The Code includes information on how to speak up when we see something we think is not right. It also ensures we are all doing our part to contribute to a safe, harmonious and productive working environment where we naturally do the right thing.

By upholding the principles set out in our Code of Conduct, we enhance our value to the community, enhance community trust in the public sector, and demonstrate that we are responsible public officers.

If you have any questions, please speak with your supervisor, manager, policy owner, or a senior People and Performance representative.

Thank you for your dedication and commitment to these principles.



Kathlene Oliver

Chief Executive Officer

17 April 2025



Contents

1. Our purpose, aspiration, values	4
2. Overview	5
2.1 Who does the Code apply to	5
2.2 Understanding the Code	5
3. Personal behaviour	7
4. Communication, official information, use of information and record keeping	8
4.1 Communication and public comment	8
4.2 Official information and use of information	9
4.3 Recordkeeping and use of information	9
5. Fraudulent and corrupt behaviour	10
6. Use of public resources	10
7. Conflicts of interest and gifts and benefits	11
7.1 Conflicts of interest	11
7.2 Gifts and benefits	12
8. Reporting suspected breaches of the Code	12
9. Seek Guidance	13
10. Reprisal action will not be tolerated	14
11. Breaches of the Code	14
12. Document Control	15
13. Amendments	15

1. Our purpose, aspiration, values

The Metropolitan Cemeteries Board, as the custodian of Perth's cemeteries, provides sensitive services and places that honour the lives of the diverse Perth community.

A self-funded statutory authority, the Metropolitan Cemeteries Board operates seven cemeteries and memorial parks across Greater Perth.

Our Purpose

As custodians of Perth's cemeteries, we provide sensitive services and places that honour the lives of our diverse community.

Our Aspiration

To be a sanctuary for our community, preserving history and culture and providing places for remembrance and connection.

Our Values



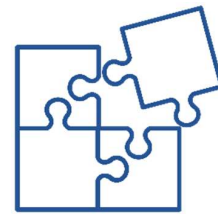
Compassion

We have empathy
for those we serve
and work with



Integrity

We will do the
right thing



Connection

Build relationships
through
understanding

2. Overview

Our Code of Conduct (the Code) outlines the ethical behaviour and obligations of those who are employed by, or act on behalf of, the Metropolitan Cemeteries Board (MCB). Ethical behaviour relates to personal integrity, relationships with others, and accountability for behaviour, decisions, and actions.

The Code forms part of our [Integrity Framework](#) reflecting legislative requirements and is supported by MCB policies, procedures, and guidelines.

Employees must complete Accountable and Ethical Decision-Making training. Training must be completed during induction with the MCB and every three years thereafter. Corporate Executive and the Board must complete training on a yearly basis

The Code has been developed in accordance with the [Public Sector Management Act 1994](#) (PSM Act) and requirements of Commissioner's [Instruction No. 40: Ethical Foundations](#).

This Instruction repeals and replaces Commissioner's Instruction 7: Code of Ethics and Commissioner's Instruction 8: Codes of Conduct and Integrity Training under section 21(2) of the PSM Act.

The Code

- establishes the minimum standards of conduct and integrity
- helps employees understand and embody the MCB values (**compassion, integrity, connection**)
- promotes professionalism and excellence
- informs employees of the standards they can expect, and the behaviour expected within the MCB
- provides guidance on responsibilities and defines obligations
- is consistent with and builds on the [Public Sector Code of Ethics](#)

2.1 Who does the Code apply to

The Code applies to, but is not limited to, all permanent, fixed-term, casual employees; officers seconded to the MCB, volunteers; student placements; work experience personnel; as well as service providers and contractors.

For the purposes of this document, the term "employee" has been used to refer to all the above people engaged by the MCB.

Failure to comply or adhere to the Code may result in disciplinary action and a consequence could be termination of employment or contract.

2.2 Understanding the Code

The Public Sector Commissioner' [Instruction No. 40: Ethical Foundations](#) requires all public sector bodies and public officers to demonstrate the highest standard of workplace behaviour and personal integrity by complying with the principles of conduct in section 9 of the [Public Sector Management Act 1994](#) and a set of minimum standards of conduct and integrity which put these principles into practice.

Principles of conduct

We:

- comply with legislation, Commissioner's instructions, public sector standards and any applicable codes governing our conduct
- act with integrity
- use official information, equipment and facilities scrupulously
- deal with people courteously, considerately and sensitively

Minimum standards of conduct and integrity

Standard 1: Integrity

We:

- act honestly and uphold the trust placed in us by the community
- use our position and authority for the purpose intended
- provide objective and timely advice of the government of the day
- ensure our behaviour upholds the good reputation of our public sector body and the public sector

Standard 2: Impartiality

We:

- make considered and unbiased decisions on merit
- place the public interest over our personal interest
- declare and manage conflicts of interest
- implement government priorities, policies, and decisions impartially

Standard 3: Respect for others

We:

- communicate with and treat people with respect
- treat people fairly, having regard for their diverse backgrounds
- work together constructively, inclusively, and professionally

Standard 4: Trust and accountability

We:

- take accountability for our time, decisions, actions, and behaviours
- are responsive and provide considered advice and information to our clients, customers, and stakeholders
- make decisions that ensure the best use of resources for now and the future
- access, use and disclose information only where we are authorised to do so
- record our decisions for transparency allowing for review and scrutiny

The Code builds on these minimum standards and requires all employees to uphold the standards of behaviour set out in the following sections:

- Personal behaviour
- Communication, official information, use of information and record keeping
- Fraudulent or corrupt behaviour
- Use of public resources
- Conflicts of interests, gifts and benefits
- Reporting suspected breaches of the Code

3. Personal behaviour

As representatives of the MCB, we work in a position of trust. We act **honestly** and with **integrity** in the performance of our duties, in our **personal conduct**, and how we treat others. Modelling high standards of personal behaviour promotes positive work environments in which our clients, colleagues, and the community can thrive.

We:

- act honestly and impartially in the performance of our duties
- lead by example, carrying out our duties to the best of our ability and striving for excellence by setting high standards in our performance and personal conduct.
- understand and comply with the Code, MCB policies and procedures, and legislation governing our personal and professional conduct
- show respect and compassion to others, follow instructions, lawful orders and directions from a manager or someone who has authority to give such direction, cooperate and answer questions truthfully and work collaboratively with supervisors and colleagues
- act without prejudice
- ensure that our behaviour and actions, whether at work or in our private lives, do not bring the MCB or ourselves into disrepute
- maintain and contribute to a safe, healthy, and psychologically safe workplace for all, fostering environments that support genuine participation and contribution by everyone
- attend work fit to perform our duties, unimpaired by drugs or alcohol
- inform our line manager if we are on medication that could affect our attendance or duties
- establish clear professional boundaries to protect everyone from misunderstandings and violations of professional relationships
- speak up and take action when you see something that is not right, ensuring that our workplace remains ethical and safe for everyone

- report any criminal charges, convictions or serious offences committed during the term of our employment, including spent convictions where required. We also report any changes in circumstances that may affect our ability to fulfill job requirements, such as the loss of a driver's license.
- dress professionally and appropriately for our work and workplace, using personal protective equipment (PPE) correctly and as required
- do not tolerate or engage in bullying, discrimination, or harassment of any kind. We maintain a zero-tolerance policy.
- do not engage in misconduct or criminal behaviour
- do not smoke or use e-cigarettes in the MCB vehicles, within 5 metres of a public entrance to an enclosed public place, or within 10 metres of air conditioning intakes

4. Communication, official information, use of information and record keeping

In the course of our employment, we are entrusted with sensitive and confidential information. It is important that we maintain **confidentiality** and use that information in an appropriate manner.

The **integrity and accuracy** of our records is also extremely important. **Complete, accurate and secure records** are relied upon for our decision making, organisational efficiency and benefits the recipients of our services and community.

We only use official information for **authorised purposes**.

4.1 Communication and public comment

We:

- refer all media enquiries to the Office of the Chief Executive to ensure accurate and consistent communication
- ensure our communications do not conflict with or are perceived to conflict with our roles as public officers
- ensure that public comments made in a personal capacity are not seen or perceived to be official comments on behalf of the MCB or any other public sector organisation
- ensure any contact with lobbyists is in accordance with Public Sector Commissioner's [Instruction No. 16 : Government Representatives Contact with Registrants and Lobbyists](#)
- adhere to all legal requirements, policies, and other lawful directives regarding communication with Parliament, ministers, ministerial staff, lobbyists, the media, and members of the public
- do not participate in public and/or online forums, either orally or in writing, in an official capacity or as MCB employees, unless authorised to do so

- do not disclose, comment, or post inappropriate material about recipients of our services, colleagues, or the MCB on work or personal social media sites. Additionally, we refrain from engaging in inappropriate communication with recipients of our services via social media, emails, or messaging platforms.

4.2 Official information and use of information

Official information means non-public information that comes into your knowledge or possession because of your employment.

We:

- respect the privacy of individuals and ensure the security of personal information
- comply with the [State Records Act 2000 \(WA\)](#) and do not make an unauthorised disclosure within the meaning of section 81 of the [Criminal Code Act 1913 \(WA\)](#)
- are trusted custodians and protectors of official information and records, including intellectual property
- only access, share, or disclose agency-held information in the lawful execution of our duties, as authorised by policy or legislation.
- share information with colleagues to support the achievement of the MCBs strategic initiatives
- seek advice about the appropriate release of information if you are unsure
- do not access the MCB databases or information without a legitimate work-related purpose and can demonstrate why the information was accessed if required
- do not access the MCB's systems, data or information for personal reasons or purposes that are not part of our official duties, or out of curiosity.
- do not make improper use of official information obtained in our daily duties for direct or indirect personal or commercial gain for ourselves or others, or to harm others

4.3 Recordkeeping and use of information

We:

- meet our obligations under the [State Records Act 2000 \(WA\)](#) by properly documenting actions, decisions, and work practices
- securely store sensitive, confidential information and personal information to protect privacy and confidentiality
- protect intellectual property and ensure its proper use
- comply with the [Privacy and Responsible Information Sharing Act 2024](#), ensuring information about ourselves and recipients of our services is accurate, complete, up-to-date, and not misleading
- proactively manage information communications and technology to prevent unauthorised access (e.g., locking our workstations when unattended, not sharing passwords)
- manage information in corporate systems so it is accessible and retained for as long as required. Information is only destroyed in accordance with the [MCB's Records Keeping Plan](#)

- meet our obligations under the [Freedom of Information Act 1992](#), ensuring records are appropriately recorded and any Freedom of Information (FOI) requests are handled in accordance with the FOI Act
- do not falsify, destroy, alter or damage public records or back-date information

5. Fraudulent and corrupt behaviour

Fraud includes any practice that involves deliberate deceit or other dishonest means by which benefit is obtained. Fraud can include theft, deception, falsifying records, providing false information, or manipulating expenses or salaries.

Corruption is a dishonest activity in which an employee acts against the interests of the agency and abuses their position of trust to achieve some personal gain. Corruption can include taking or offering bribes, theft, embezzlement, misusing information or material acquired through your role at work or failing to disclose conflicts of interest.

Fraud and Corruption are criminal offences and not only harm the MCB and its reputation but also the recipients of our services and the community.

We:

- make ethical decisions that reflect our values - compassion, integrity, and connection
- immediately report any information about actual or potentially fraudulent, corrupt, or illegal activities to ensure accountability and transparency
- do not engage in fraudulent or corrupt behaviour, upholding the trust placed in us by our colleagues, clients, and the community
- do not use, or attempt to use, our position or authority to cause a detriment or to gain personal benefit for ourselves or others

6. Use of public resources

Public resources include office facilities, corporate credit cards, motor vehicles, computers, software, photocopiers, phones, printers, other equipment, and work time

We are entrusted to use public resources, on behalf of the community, to deliver outcomes for the public. We must be responsible and accountable for the use of those public resources.

We:

- use public resources responsibly and efficiently, mindful of our duty to the community
- follow relevant State government policies and the MCBs' policies and procedures to procure goods, services and works

- are accountable for all expenditure, including the use of public money for hospitality and travel
- complete timesheets and leave applications accurately and submit in a timely manner
- use the MCBs' resources, including portable items such as computers, phones, laptops and vehicles responsibly and only for permissible purposes
- report any damage to, or loss of the MCBs' property or equipment immediately to the appropriate person
- do not use corporate credit cards to incur personal, non-work-related expenditure
- do not use work time or resources for political party work, secondary employment, external volunteering activities or private financial gain

7. Conflicts of interest and gifts and benefits

A **conflict of interest** is a situation arising from conflict between the performance of a public duty and private or personal interests. Conflicts of interest can be **actual, perceived or potential**.

It is not necessarily wrong or unethical to have a conflict of interest, but it is important that any conflict of interest is properly identified, documented and managed to ensure it doesn't compromise the integrity or the public's confidence in the MCB.

7.1 Conflicts of interest

We:

- recognise when an actual, perceived or potential conflict of interest exists and register it via the online Conflict of Interest Declaration Form.
- manage conflicts of interest through an approved management plan
- perform our duties in the public interest, without favour or affection, malice or ill-will
- acknowledge that an identified conflict of interest may change over time and ensure that it continues to be managed appropriately throughout our employment
- follow relevant legislation, Commissioner's Instructions and Human Resource procedures when recruiting employees
- seek prior approval to undertake secondary employment via the online Application for Secondary Employment Form
- submit a conflict-of-interest declaration if we are in an intimate relationship or have a familial or close personal association with an employee at the same site/business area, particularly within the same management and/or if one employee is senior to the other
- complete annual conflict of interest declarations
- do not allow any political, private or commercial interests to influence our decisions or actions as employees. Interests include, but are not limited to, family, friends, associates, investments, relationships, voluntary work, or group memberships. It is our personal

responsibility to understand what a conflict of interest is, know how to identify one, and how to declare one.

- do not engage in nepotism or patronage in decision making, purchasing, awarding of contracts, staff recruitment and appointment processes

7.2 Gifts and benefits

Accepting or giving gifts, benefits or hospitality can create a conflict of interest; influence decision making; create a culture of entitlement and/or present opportunities that could escalate into bribery, misconduct or corruption.

We:

- decline all offers of gifts, benefits, or hospitality, wherever possible to maintain integrity and avoid conflicts of interest
- declare all offers, receipts and provision of gifts, benefit or hospitality via the online form to ensure transparency and accountability
- do not give or offer gifts, benefits or hospitality unless through documented, approved arrangements
- do not solicit gifts, benefits or hospitality to prevent any undue influence or perception of impropriety

8. Reporting suspected breaches of the Code

We are committed to maintaining the highest standards of conduct and integrity. Reporting breaches of the Code is essential to uphold these standards and ensure a fair and respectful workplace.

We:

- promptly report allegations or legitimate suspicions regarding suspected breaches of the Code
- appropriate avenues to raise concerns, ensuring they are addressed effectively
- maintain confidentiality when reporting allegations and during disciplinary processes to protect all parties involved
- take individual responsibility for upholding and implementing the Code
- handle complaints and grievances fairly and confidentially, ensuring a just process for all
- must have reasonable grounds for suspecting breaches of the Code before making a report
- do not make false, frivolous, or vexatious allegations, maintaining the integrity of the reporting process

You can report suspected breaches of the Code to:

- your line manager, any manager, or a senior HR representative
- a Public Interest Disclosure Officer (PID). The names of PID Officers is available on the Intranet, with PID Officers also including the Chief Executive Officer and the Chief Human Resources Officer.

You can also report misconduct to external agencies including the:

- [Public Sector Commission](#) for minor misconduct
- [Corruption and Crime Commission](#) for serious misconduct
- [Western Australia \(WA\) Police](#) for criminal matters
- [Ombudsman WA](#) for matters of administration affecting individuals
- [Equal Opportunity Commission](#) WA for discrimination matters.

9. Seek Guidance

The Code does not describe every possible situation you might encounter. It is important to reflect on the MCB values and purpose.

There will be situations that will require ethical decision making that may not be covered in the Code. In such cases, it is the responsibility of all employees to review the relevant policy and seek advice from their line manager as needed.

The **S.E.L.F.** test is a tool that can help you make the right decisions, on a day-to-day basis.

S.

SCRUTINY

When making decisions or taking actions, consider whether they will withstand scrutiny from the community, the MCB, the judiciary, the Corruption and Crime Commission, or the Government. Reflect on how others would judge your actions and ensure they align with our values of compassion, integrity, and connection.

E.

ETHICAL

Ask yourself: Does your decision or behaviour comply with the MCB's values and the Code? Am I doing the right thing?

L.

LAWFUL

Ask yourself: Does your decision or behaviour comply with policies, procedures, and legislation? Ensure your actions are lawful and align with our values.

F.

FAIR

Ask yourself: Is your decision or behaviour fair for the MCB, the community, your colleagues, family, and yourself? Ensure your actions are just and equitable, reflecting our values.

10. Reprisal action will not be tolerated

The MCB will not tolerate any form of reprisal action against individuals who speak up about breaches of the Code, fraud, corruption, or integrity and conduct matters. Reprisal actions are a serious breach of the Code and may result in disciplinary action, including termination of employment.

11. Breaches of the Code

The MCB will address breaches of the Code by its employees in a professional and appropriate manner, according to the circumstances of each case. Breaches can result in a reprimand, an improvement action, a financial penalty or disciplinary action, which can range from a warning to termination of employment.

11.1 Organisational context

The MCB is statutory authority established under the [Cemeteries Act 1986](#) (the Cemeteries Act). For the purposes of the [Public Sector Management Act 1994](#) (PSM Act) it is a Senior Executive Service (SES) organisation listed in Schedule 2.

As an SES organisation, the Chief Executive Officer is a Public Service officer, employed under Part 3 of the PSM Act.

The MCB employs all other staff (excluding SES officers) under section 10 of the Cemeteries Act. These staff do not form part of the Public Service as constituted by section 34 of the PSM Act but are instead part of the Public Sector more generally, with their engagement subject to relevant awards and industrial agreements.

Part 5 of the PSM Act, which deals with substandard performance and disciplinary matters, does not apply to MCB public sector employees. Instead, these matters are handled according to applicable awards and/or agreements, the MCB policies, or common law.

Alleged breaches of the Code will be assessed and may be investigated promptly, fairly, and impartially. All parties will be treated with respect, and the matter will be resolved transparently and justly.

Any action taken due to misconduct will consider all available options for addressing breaches of this Code, following the MCB disciplinary policy and procedures, as well as any relevant legislation.

Matters may also be referred to the Public Sector Commission, Corruption and Crime Commission, or the WA Police.

12. Document Control

Publication date	17 April 2025
Review date	April 2025
Next review date	August 2026
Owner	Chief Executive Officer

13. Amendments

Version	Date	Author	Description
1.1	17/04/2025	Chief HR Officer	Amendments to reflect requirements of Commissioner's instruction 40 – Ethical Foundations