

Code of Ethics & Conduct Policy & Procedure

1. Purpose

To set clear expectations of ethical behaviour, integrity and professionalism for all personnel, and to ensure a safe, respectful and compliant learning/work environment in line with the Standards for RTOs 2025 and applicable legislation. Ethical conduct in this Policy is an operational control to support compliance across training quality, marketing/representation, learner protection, records and data governance, and third-party oversight.

2. Scope

Applies to all employees, trainers/assessors, administration staff, managers, contractors and volunteers, across all locations and delivery modes—onsite, offsite, online, industry placements and partner/third-party sites.

3. Principles

- Integrity & fairness: act honestly, avoid conflicts, declare interests, and make decisions transparently.
- Respect & inclusion: treat students, colleagues and stakeholders with dignity; no discrimination, harassment or victimisation.
- Safety & wellbeing: follow WHS duties and model safe practices.
- Confidentiality & privacy: protect student/staff information and College IP.
- Accountability: use College resources lawfully and efficiently; maintain accurate records and cooperate with audits.

4. Professional Conduct – Representation of the College and any external authority if training on their behalf

All administration and training staff must present and communicate professionally whenever representing the College. When delivering Health and Safety Representative (HSR) training approved by or relating to the Work Health and Safety Commission (WA), staff must uphold the highest standards of professionalism and impartiality; use only College-approved and current information/wording regarding approval status; avoid implying endorsement beyond formal approval; and follow brand/wording protocols and any event directions issued by the College. If in doubt, seek written advice from Compliance before making public statements.

5. Expected Conduct

5.1 Conflicts, Gifts, Money & Benefits

No misuse of position, gifts or advantages. Declare and manage conflicts of interest in writing before participating in related decisions. Staff with procurement or assessment-related authority must disclose relationships that might reasonably be perceived to influence their impartiality.

5.2 WHS Responsibilities

Identify and report hazards/incidents; follow procedures; use PPE; never work under the influence of drugs/alcohol. Model safe practice in all delivery modes and venues, including third-party and workplace sites.

5.3 Information Handling & Communications

Protect confidential/official information, College IP and student records. Do not release or comment publicly without delegated approval. Use approved channels for media/public forums; clearly distinguish personal views from College positions. Marketing, enrolment and public information must be accurate, not misleading, and limited to current, approved statements about training products and approvals (including CRICOS/ESOS and WHS Commission references, where relevant).

5.4 Use of College Assets

Use resources for authorised purposes; follow equipment checkout rules; maintain care; report loss/damage immediately; do not install unauthorised software; safeguard logins and devices handling student data.

5.5 Equal Opportunity & Professional Behaviour

Provide courteous, culturally sensitive service; no discrimination or harassment; support a respectful learning environment. Managers must issue lawful, ethical instructions and intervene early on conduct risks. All staff must cooperate with complaints/appeals processes and corrective/preventive actions where conduct is implicated.

6. Reporting Concerns, Misconduct & Whistleblowing

Report suspected breaches, fraud, safety incidents or unethical conduct promptly to the General Manager. Reprisals against reporters are prohibited and may constitute serious misconduct. Criminal matters are referred to police. Where a regulator requests information, staff must cooperate and refer the request to the Director and General Manager for a coordinated response.

7. Managing Non-Compliance & Consequences

Breaches may lead to coaching, formal warnings, removal from delivery duties, termination and/or reporting to authorities/regulators. Serious breaches may trigger contract termination and external reporting. Where conduct non-compliance affects training assurance, the College may suspend delivery pending risk controls.

8. Records & Version Control

Signed Code of Ethics & Conduct Acknowledgements are stored on the HR file. Related communications, approvals and training records are retained per the Records Management Policy and applicable legislation. Compliance maintains evidence of communications and any corrective actions arising from conduct breaches.

9. Legislation & Regulatory References (non-exhaustive)

- Standards for Registered Training Organisations (RTOs) 2025 (and successors).
- Work Health and Safety Act 2020 (WA); WHS (General) Regulations 2022 (WA).
- Equal Opportunity Act 1984 (WA).
- Fair Work Act 2009 (Cth).
- Privacy Act 1988 (Cth) and Australian Privacy Principles.
- Competition and Consumer Act 2010 (Cth) – Australian Consumer Law (Schedule 2).
- Copyright Act 1968 (Cth); Spam Act 2003 (Cth).

10. Roles & Responsibilities

- All staff: comply with this Policy; complete induction/refresher training; escalate concerns; cooperate with complaints/appeals and audits.
- Managers: lead by example; manage conflicts; approve official communications; ensure records and corrective actions are completed and verified for effectiveness.
- Compliance: monitor, audit and advise; maintain frameworks and reporting; coordinate corrective and preventive actions; manage regulator requests.

Kingston Training and Employment Pty Ltd



RTO 6811 CRICOS 02899B

Policy Title	Code of Ethics and Conduct Policy and Procedure
Policy Renewal	Every 2 years
Responsibility	Compliance Manager

Record of updates and changes

Version No.	Issue Date	Nature of Amendment
Version 1		Development of policy
Version 2		
Version 3		
Version 4		
Version 5	July 2014	Terminology
Version 6	April 2018	
Version 7	Sept 2020	Changes: Conflict of interest, COVID-19
Version 8	Feb 2022	Update
Version 9	Sept 2025	General review and update for adherence to RTO Standards 2025