

Apprenticeships
Are Us



CODE OF ETHICS

INTRODUCTION

The ethical climate of an organisation is critical to establishing its credibility and achieving its mission. Apprenticeships Are Us Ltd (ARU) commits to aligning with the Australian Charities and Not-for-profits Commission (ACNC) Governance Standards and the National Standards for Group Training Organisations (GTOs) to ensure its operations adhere to ethical principles at all levels, as required by Standard 1: GTO Governance, Accountability, and Compliance.

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LEGISLATIVE & GOVERNANCE FRAMEWORK

This Code of Ethics is governed by the following legislation, regulatory standards, and internal governance requirements.

Commonwealth Legislation

- **Corporations Act 2001 (Cth)**
- **Australian Charities and Not-for-profits Commission Act 2012 (Cth)**
- **ACNC Governance Standards (1–5)**
- **Fair Work Act 2009 (Cth)**
- **Privacy Act 1988 (Cth)**
- **Cybersecurity Standards Act 2023 (Cth)**
- **Sex Discrimination Act 1984 (Cth)**
- **Racial Discrimination Act 1975 (Cth)**
- **Disability Discrimination Act 1992 (Cth)**
- **Work Health and Safety Act 2011 (NSW)**, including psychosocial hazards (2023 amendments)

Industry & Sector Standards

- **National Standards for Group Training Organisations (2017)** — especially:
 - i. Standard 1: Governance, Accountability & Compliance
 - ii. Standard 2: Effective Management Systems
- **AICD Not-for-Profit Governance Principles**

Internal Governance Instruments

- ARU Constitution
- ARU Board Charter
- ARU Conflicts of Interest Policy
- ARU Whistleblower Policy
- ARU Privacy & Cybersecurity Policy
- ARU Code of Conduct
- ARU Child Safety Framework

Compliance with these instruments is mandatory for all directors, staff, members, apprentices, contractors and volunteers.

DEFINITIONS

“Ethical Conduct”

Behaviour consistent with honesty, integrity, fairness, respect, and accountability.

“Misconduct”

Any behaviour breaching ethical, legal, regulatory or organisational standards, including fraud, corruption, bullying, discrimination, harassment, or misuse of organisational assets.

“Conflict of Interest”

A situation in which personal, financial, professional or relational interests could improperly influence decision-making.

“Confidential Information”

All non-public information acquired through ARU activity that must not be shared without authority.

“Personal Benefit”

Any gain (financial, reputational, professional, or otherwise) received by an individual that is not aligned with ARU’s best interests.

“Duty of Care”

A legal and ethical obligation to act with diligence, skill, and care in all organisational activities.

“Psychosocial Hazard”

A hazard that may cause psychological harm, including bullying, aggression, workload issues, role conflict, sexual harassment, or exposure to traumatic events.

PURPOSE

This policy provides guidelines for developing and maintaining a consensus on the ethical principles that guide ARU’s conduct. This ensures compliance with the *Corporations Act 2001 (Cth)*, *ACNC Governance Standards*, and the *National Standards for Group Training Organisations*, particularly in alignment with *Standard 1: GTO Governance, Accountability, and Compliance* to ensure ethical management of governance structures.

ETHICAL PRINCIPLES

ARU is committed to the following core ethical principles:

1. **Integrity.** acting honestly, transparently and with personal accountability.
2. **Respect.** treating all individuals with dignity, cultural awareness and fairness.
3. **Duty of Care.** ensuring physical, emotional and psychological safety for all.
4. **Equity & Inclusion.** upholding anti-discrimination laws and promoting diversity.
5. **Confidentiality.** protecting information and privacy of all stakeholders.
6. **Accountability.** taking responsibility for actions and decisions.
7. **Proper Purpose.** ensuring all decisions support ARU’s mission and beneficiaries.
8. **Impartiality.** avoiding conflicts of interest and maintaining independence.

9. **Stewardship**, protecting organisational resources and acting in the best interests of apprentices and the community.
10. **Lawful Conduct**, complying with all legislation and regulatory requirements.

These principles guide all behaviours across the organisation.

POLICY

ARU is committed to operating under an ethical code, drawn up through consultation and in compliance with applicable legislation, the *ACNC Governance Standards*, and the *National Standards for Group Training Organisations (GTOs)*. ARU will ensure that all policies and procedures are aligned with these standards, as outlined in *Standard 1: GTO Governance, Accountability, and Compliance*.

RESPONSIBILITIES

The ARU Board shall adhere to ethical standards and governance as per the *Corporations Act 2001 (Cth)*, *ACNC Governance Standards*, and the *National Standards for Group Training Organisations*. The Chair of the ARU Board shall be responsible for overseeing compliance with the Code of Ethics, while the Managing Director shall ensure that the Code is disseminated and observed by all members, employees, and stakeholders, fulfilling the requirements under *Standard 2: Effective Management Systems*.

The Chair of the ARU Board shall be responsible for carrying out the process of managing a Code of Ethics for the organisation. The ARU Board shall regularly consult with members, clients, employees, volunteers, and stakeholders on the values and ethical principles that guide ARU's conduct. This process must ensure that all feedback and practices are compliant with the ACNC Governance Standards and the National Standards for Group Training Organisations, particularly meeting Standard 3: Stakeholder and Client Engagement.

The Managing Director shall be responsible for disseminating the Code of Ethics and ensuring its observance.

DIGITAL ETHICS AND CYBERSECURITY OBLIGATIONS

All directors, staff, volunteers, contractors and Host Businesses must:

- Use ARU digital systems responsibly, securely and lawfully.
- Not store confidential information on personal devices.
- Not communicate with apprentices or minors via personal messaging or social media.
- Immediately report suspected cyber incidents or breaches.
- Protect sensitive information from unauthorised access or disclosure.
- Follow ARU's Cybersecurity Policy and system access protocols.

Unauthorised access, inappropriate digital conduct, or misuse of ARU systems is considered a breach of this Code.

PSYCHOSOCIAL SAFETY AND RESPECTFUL CONDUCT

ARU promotes a psychologically safe environment. Ethical conduct includes:

- treating others with dignity and respect
- preventing bullying, harassment and discrimination

- avoiding aggressive, coercive, or manipulative behaviour
- addressing conflict constructively
- promoting wellbeing and mental health
- reporting unsafe practices or psychological risks

This aligns with the WHS Act and psychosocial hazard regulations.

REPORTING ETHICAL BREACHES AND WHISTLEBLOWER PROTECTION

ARU encourages reporting of unethical behaviour, misconduct or breaches of this Code. Individuals may report concerns to:

- Managing Director
- Chair of the Board
- Whistleblower Protection Officer
- External regulators (ACNC, ASIC, Fair Work Ombudsman)

All disclosures will be managed confidentially in accordance with:

- ARU Whistleblower Policy
- Treasury Laws Amendment (Enhancing Whistleblower Protections) Act 2019
- ACNC governance requirements

Retaliation, victimisation or adverse action against whistleblowers is strictly prohibited.

PROCEDURES

1. The ARU Board shall organize regular consultation with members, clients, employees, volunteers, and stakeholders on:
 - The values that the organisation wishes to embody, and
 - The specific ethical imperatives that are implied by these values.
2. The discussions around these issues should be used as a means to raise awareness of the significance of ethical attitudes to the effective operation of the organisation.
3. The ARU Board shall then:
 - Review the policies of the organisation to ensure that these are not in conflict with the organisation's ethical principles, and
 - Maintain a draft Code of Ethics for the organisation.
4. It should be noted that the organisation's ethical position is represented both by the organisation's policies and by its Code of Ethics, and any particular ethical guideline does not necessarily need to be repeated in both.
5. The Code of Ethics should then be circulated for discussion and comment to members, clients, employees, volunteers, and stakeholders. Again, the discussion should be used to forward a commitment among all concerned with the organisation to the ethical operation of the organisation.
6. The ARU Board may make any alterations it sees fit, and the resulting Code of Ethics shall be presented for the approval of the membership at the next Annual General Meeting.
7. Once the Code of Ethics has been approved by the Annual General Meeting it shall be implemented by the organisation. Procedures should then be instituted to provide sanctions and penalties for breaches of the Code.

The ARU Board will review the Code of Ethics annually to ensure it remains compliant with the Corporations Act 2001 (Cth), ACNC Governance Standards, and the National Standards for Group Training Organisations. This process aligns with Standard 2: Effective Management Systems to ensure the policy remains current and reflects legal and ethical best practices. Any significant amendments to the Code will be presented for approval at the Annual General Meeting.

The ARU Board shall ensure that appropriate sanctions and penalties are in place for breaches of the Code of Ethics. These sanctions may include disciplinary actions, termination of membership or employment, and legal proceedings in cases of serious violations. ARU is committed to enforcing this Code in line with the *ACNC Governance Standards* and *Corporations Act 2001 (Cth)*. This is also in alignment with *Standard 1: GTO Governance, Accountability, and Compliance*, which emphasizes the need for accountability and appropriate disciplinary action.

CULTURAL SAFETY AND INCLUSION

ARU is committed to:

- creating culturally safe environments for Aboriginal and Torres Strait Islander peoples;
- respecting cultural and linguistic diversity;
- ensuring inclusion of LGBTQIA+ individuals;
- supporting individuals with disability;
- preventing discriminatory behaviour;
- promoting inclusive governance and decision-making.

Cultural safety is a fundamental ethical responsibility of all members of ARU.

APPENDIX A

CORPORATE GOVERNANCE CODE OF ETHICS

INTRODUCTION

This Corporate Governance Code of Ethics reflects ARU's dedication to adhering to the highest standards of corporate governance, in compliance with the *Australian Charities and Not-for-profits Commission (ACNC)*, the *Australian Institute of Company Directors (AICD)*, and the *National Standards for Group Training Organisations (GTOs)*. ARU Board members are expected to uphold these principles in their decision-making, ensuring transparency, accountability, and integrity at all times, fulfilling *Standard 1: GTO Governance, Accountability, and Compliance*.

VOLUNTEERS

- In all matters conducted under ARU's auspices, volunteers and staff must comply with the *Fair Work Act 2009 (Cth)*, *Workplace Health and Safety Act 2024 (Cth)*, and *Anti-Discrimination Act 1977 (NSW)*. Volunteers and staff are expected to prioritize the organisation's interests over personal interests and act in accordance with ARU's commitment to equality and diversity. This ensures compliance with *Standard 2: Effective Management Systems*, ensuring fair and lawful practices within the workplace.
- Volunteers shall diligently adhere to the provisions stipulated in the organisation's constitution, policies, and rules.
- A culture of respect shall be paramount in interactions with all members of the organisation, its staff, office-bearers, and clients.
- To enhance their effectiveness, volunteers shall willingly undertake any necessary training relevant to their duties.
- In the execution of work for the organisation, volunteers shall faithfully follow the guidance provided by their designated supervisors.
- Volunteers shall conduct themselves in a manner that upholds and enhances the organisation's reputation and mission.

CONTRACTORS, CONSULTANTS AND HOST BUSINESSES

All contractors, consultants and Host Businesses engaged by ARU must:

- uphold this Code of Ethics;
- comply with all workplace, safety, privacy and anti-discrimination laws;
- ensure ethical treatment of apprentices and trainees;
- maintain safe, inclusive and respectful work environments;
- report misconduct or risks immediately to ARU.

Failure to meet these standards may result in termination of engagement or host contract.

STAFF / MEMBERS

- In all matters conducted under the auspices of Apprenticeships Are Us Ltd, staff and members shall consistently prioritise the organisation's interests over their personal interests or those of any other individuals.
- Staff and members shall scrupulously observe the provisions of the Constitution, policies, and rules of the organisation, including adherence to policies governing conflicts of interest.
- Staff and members shall diligently and competently fulfill their contractually specified duties with enthusiasm.
- A culture of respect shall be paramount in interactions with other staff, organisation members, office-bearers, and clients.
- To ensure effectiveness, staff and members shall proactively engage in any training essential for their duties.
- In the execution of work for the organisation, staff and members shall faithfully follow the directions provided by their designated supervisors.
- Staff and members shall conduct themselves in a manner that upholds and enhances the organisation's reputation and mission.

ARU BOARD MEMBERS

- In all matters conducted under the auspices of Apprenticeships Are Us Ltd, ARU Board members shall consistently prioritise the organisation's interests over their personal interests or those of any other individuals.
- ARU Board members shall rigorously observe the provisions of the Constitution, policies, and rules of the organisation.
- To facilitate effective governance, ARU Board members shall make every effort to attend all ARU Board meetings, or if unable to do so, shall provide advance notice of their absence to the Secretary.
- ARU Board members shall allocate the necessary time required to fulfill their duties thoroughly and effectively.
- To ensure governance excellence, ARU Board members shall actively participate in any training essential for their duties.
- A culture of respect shall be paramount in interactions with other ARU Board members, organisation members, staff, office-bearers, and clients.
- ARU Board members shall conduct themselves in a manner that upholds and enhances the organisation's reputation and mission.

This Corporate Governance Code of Ethics is our solemn commitment to the principles of corporate governance and reflects our dedication to the highest standards as outlined by AICD, ACNC, and the Corporations Act 2001. It is a cornerstone in our pursuit of long-term organizational success and sustainability.

BREACHES OF THE CODE OF ETHICS

Breaches of this Code may result in:

- counselling or warning;
- performance management;

- removal from a committee or project;
- termination of employment or engagement;
- removal from the Board;
- termination of Host Business placements;
- legal action in cases of fraud, corruption, or criminal conduct;
- reporting to ACNC, ASIC or law enforcement where required.

Sanctions will be proportionate to the breach and applied in accordance with procedural fairness.

REVIEW AND CONTINUOUS IMPROVEMENT

The ARU Board will review this Code annually to ensure it:

- remains compliant with applicable legislation
- reflects contemporary ethical expectations
- aligns with GTO Standards and ACNC governance frameworks
- incorporates stakeholder feedback
- supports a culture of continuous improvement

Significant amendments will be submitted for approval at the Annual General Meeting.

AUTHORISATION

Michael Wentworth



Managing Director

Apprenticeships Are Us Limited

DOCUMENT CONTROL

Version	Authorised by	Authorisation Date	Sections	Amendment
1.1	M. Wentworth	27/10/2022	All	N/A
1.2	M. Wentworth	02/11/2023	All	Cover page, information update
1.3	M. Wentworth	31/10/2024	All	Information update
1.4	M. Wentworth	25/11/2025	All	Information update