



BEFORE, AFTER & VACATION CARE

CODE OF CONDUCT

TeamKids, February 2026



FUN

GENUINE

INNOVATIVE

INVOLVED

REMARKABLE

At Team Holiday Pty Ltd and its associated entities, including TeamKids, Kids Unlimited and Stand Up Project (“the Company”) we require that all of our team members conduct themselves according to the highest standards of ethics, integrity, and behaviour when dealing with our clients (children/parents), colleagues and other stakeholders. This includes, but is not necessarily limited to, full compliance with all legal obligations imposed by statute or any other source of law.

POLICY OBJECTIVE

All team members, volunteers, and contractors share the responsibility to uphold the Company’s values of integrity, respect, and accountability. These standards outline the behaviour expected in all professional interactions and ensure that our work environment is safe, inclusive, and aligned with our organisational goals.

The following guidelines establish clear expectations to promote fairness, trust, and professionalism at all times, and should be read in conjunction with other TeamKids policies that detail behavioural expectations of team members, specifically including, but not limited to:

- **Respect in the Workplace Policy**
- **WHS Policy**
- **Social Media Policy**
- **Drug and Alcohol Policy**
- **Supervision Policy**
- **Child Protection Policy**

STANDARDS OF CONDUCT

All team members, volunteers, and contractors are expected to consistently demonstrate and uphold the highest standards of conduct, professionalism, and integrity in all actions and interactions throughout the duration of their employment or engagement with the Company.

PROFESSIONALISM AND INTEGRITY

- **Honesty and Fairness:** Act in a professional, honest, and fair manner in all dealings with children, colleagues, external providers, school staff, Company management, and the general public.
- **Courtesy and Respect:** Treat all individuals with courtesy, respect, and dignity in every interaction, ensuring communication is free from harassment, discrimination, and inappropriate behaviour.
- **Faithfulness & Diligence:** Remain faithful, diligent, and actively pursue the Company’s best interests in all your actions.

WORKPLACE BEHAVIOUR AND RELATIONSHIPS

- **Respectful Communication:** Ensure all communications, including those on social media, are conducted in a respectful manner. Refrain from harassment, discrimination, or unfair treatment of colleagues, clients, or customers (e.g., ethnic slurs, personal insults, inappropriate references to sexuality, obscenities, or derogatory language).
- **Bullying and Harassment:** Do not engage in any bullying, discriminatory, or harassing behaviour toward children, colleagues, external providers, school staff, Company management, or the general public.

- **Social Media Conduct:** Refrain from making any statements about the Company on social media or other public platforms that may harm its reputation.

COMPLIANCE AND LEGAL OBLIGATIONS

- **Policy Adherence:** Comply with all Company and workplace policies, procedures, rules, regulations, and contracts.
- **Legal Compliance:** Abide by all applicable laws and regulations governing our industry.
- **Personal compliance:** Ensure you maintain current, relevant qualifications and checks as required by governing regulations to be suitable and fit to work with children.
- **Notification of Changes to Personal Circumstances:** Promptly notify the Company of any changes in your personal circumstances that may impact your ability to work in the Children's Services industry (e.g., deferral from educational studies, investigations into breaches of child safety standards).

HEALTH, SAFETY AND WELLBEING

- **Workplace Health and Safety:** Work in a safe and compliant manner, following all workplace health and safety rules and responsibilities.
- **Substance-Free Workplace:** Refrain from using prohibited drugs or alcohol at work or arriving at work while under the influence.
- **Fit for Duty:** Ensure you maintain current, relevant qualifications and checks as required by governing regulations to be suitable and fit to work with children.

CONFIDENTIALITY AND COMPANY REPRESENTATION

- **Confidentiality:** Maintain the confidentiality of all Company information, records, and materials acquired during employment, both during and after the termination of employment.
- **Media & Public Representation:** Do not make any unauthorised statements to the media about Company business or any public statements that may harm the Company's reputation.
- **Employment Conflicts:** Do not engage in employment or provide services to any other person, supplier, competitor, or entity without the Company's prior written consent.

APPEARANCE AND PUNCTUALITY

- **Punctuality:** Ensure punctuality and adhere to agreed work schedules.
- **Professional Appearance:** Dress in a presentable, clean, neat, and tidy manner, including wearing any required Company uniforms.

PROPERTY AND COMPANY INTERESTS

- **Respect for Property:** Treat Company property with care and respect.
- **Best Interests:** Actively always promote and protect the best interests of the Company.
- **Uphold Core Values:** At all times, behave in a way that upholds the Company's core values, integrity, and reputation.

CHILD SAFETY

Company has zero tolerance for racism, child abuse and inequality. We are dedicated to creating a safe environment for all children, where abuse and harm are not tolerated. Child safety is our top priority, and we actively support and encourage the prevention and reporting of abuse and

harm to children. All team members, volunteers, and contractors share the responsibility of promoting the safety, well-being, and empowerment of every child.

The standards outlined below identify positive child safe behaviours that we ask staff, volunteers and contractors to demonstrate at all times, as well as behaviours that we consider unacceptable and not permitted.

STANDARDS OF BEHAVIOUR

By engaging with the Company as a team member, volunteer or contractor, it is an expectation that **you will**:

- Protect children from harm or abuse, taking any disclosures seriously and reporting concerns or breaches to management immediately.
- Participate in compulsory training, including child safety and wellbeing programs.
- Treat all children with respect, regardless of their background, and promote inclusivity, helping every child feel included and supported.
- Consider the unique needs of each child, particularly Aboriginal children, and ensure they feel welcome, respected, and able to express their cultural identity.
- Report any instances of racism and help create a safe, inclusive environment for people of all cultures.
- Identify, confront, report and take a zero-tolerance approach to racism and other harm to Children, and ensure that any instances of racism are addressed.
- Listen to and value children's ideas, responding if they feel unsafe, and encouraging peer support and friendships.
- Involve children, parents, and carers in decisions about activities, fostering a sense of community.
- Declare any conflicts of interest that may affect my ability to perform your role impartially.
- Respect the privacy of children and their families, keeping personal information confidential unless legally required to disclose it.
- Inform parents/carers of any situations outside the Code of Conduct that require special management, such as driving a child or one-on-one sessions.
- Comply with all relevant legislation and the Company's child safety policies, always prioritising the rights and needs of children.

It is also expected that as a team member, volunteer or contractor, it is an expectation that you **will not**:

- Engage in or condone any illegal, unsafe, abusive, or harmful behaviour, including physical, sexual, emotional abuse, neglect, or grooming.
- Ignore or downplay concerns or disclosures of abuse or harm.
- Use offensive language, verbal abuse, or hurtful behaviour towards children.
- Fail to report abuse to authorities when required.
- Touch children unnecessarily or inappropriately or perform tasks they can do themselves.
- Criticise, denigrate, or deliberately isolate a child, or create a climate of fear.
- Offer children alcohol, cigarettes, drugs, or expose them to inappropriate content, including pornography.
- Use sexual language, gestures, or share details of sexual experiences with children.
- Develop 'special' relationships or show favouritism, including giving gifts or undue attention.
- Have unauthorised contact with children via social media, phone, or online.
- Take unauthorised photos or share images of children in activities.
- Be alone with a child without professional justification.

- Engage in babysitting, tutoring, or mentoring outside of work hours without approval.
- Enter changing/bathroom facilities without knocking.

INAPPROPRIATE CONDUCT

When implementing behaviour guidance in a TeamKids service, it is important that any person working directly with children, considers that it is an offence under the Education and Care Services National Law Act 2010, (Section 166A) to subject a child to inappropriate conduct.

There are specific elements to be considered depending on the role that you hold within TeamKids:

Approved providers and nominated supervisors must ensure that children are not subjected to inappropriate conduct while at an education and care service and failure to do so will be an offence. The approved provider will value and model a child safe culture, practices and appropriate conduct at all times. This is supported by monitoring and supporting all staff and educators, through providing guidance and professional development.

It is an offence for an approved provider, nominated supervisor, staff member or volunteer (including students) to subject a child to conduct that a reasonable person would consider to be inappropriate in an education and care service.

The legislation references conduct that a reasonable person would consider to be inappropriate in the circumstances, while that child is being educated and cared for at an education and care service including:

- Whether it is likely to cause harm (physical, emotional or psychological) to the child.
- Whether the behaviour is consistent with expected practice in an early childhood setting (OSHC)
- Whether it transgresses expectations about what is acceptable in an education and care service
- The child's age and developmental stage
- Whether the behaviour is sexual, violent or aggressive.

Factors that will not be taken into account in determining whether the conduct is inappropriate include:

- Whether or not the child consented to the conduct
- Whether the person accused of the offence is related to the child.

A child may be subjected to inappropriate conduct:

- In person, either directly or by witnessing it happening to others
- Through verbal or electronic communication
- By electronic capture, including photographs, recordings or live video.
- Through repeated actions or ongoing patterns of behaviour over time.

HOW TO RECOGNIZE INAPPROPRIATE CONDUCT:

Inappropriate conduct breaches professional boundaries and may pose a significant risk to children's safety and wellbeing.

- **Inappropriate physical conduct** – touching a child in a sexualised or intrusive way, including tickling, wrestling, prolonged or unnecessary hugging that is not warranted in the circumstances, massaging or physical closeness (such as encouraging a child to sit on an educators lap for an extended period) that is not age appropriate or required, based on the needs or abilities of a child.

- **Grooming behaviours** – including but not limited to favouritism, offering gifts or special privileges, encouraging emotional dependency (attachment fostering), or initiating private or secret communication with a child.
- **Ill Treatment that is not disciplinary in nature** – including physical or verbal abuse, threats, yelling, swearing, rough handling or other conduct likely to cause emotional, physical or psychological harm. This may include speaking aggressively to a child or using negative language towards a child, which may be perceived as bullying or harassment.
- **Unprofessional communication** – such as sending personal messages, capturing or sharing images of children via unauthorised devices or platforms, or engaging with children online through social media or apps unrelated to your role. This may also include inappropriate staff to staff conduct. Examples of this are an educator yelling to another educator in front of children, make sarcastic comments about their competence or question their decisions in a hostile tone.

Educators need to notify their Director of Service, Regional Manager or other management representative if they observe, suspect or receive an allegation that someone is engaging in, or has engaged in inappropriate conduct. The Quality and Compliance Team are then notified to ensure the Regulatory Authority is notified within the legislated 24-hour period.

SUSPECTED BREACHES

In the event of a potential breach by another person in the organisation of this code of conduct, it is expected that all team members, volunteers, and contractors will act promptly and report any incident or concerns as soon as possible to their direct manager, or directly to People and Culture.

In the event of potential harm or abuse of a child, concerns should be raised immediately to childsafety@company.com.au.

Protections and confidentiality provisions are available for anyone making a report.

Where these standards are not met, appropriate disciplinary action will be taken. In cases where the breach involves serious misconduct, this may result in summary dismissal. In cases where a breach of the policy involves a breach of any law, then the relevant government authorities or the police may be notified.

VERSION CONTROL

Policy Name: Code of Conduct

Policy No:

Month Reviewed: Jan 2026

Month Next Review Date: Jan 2027

Policy Owner: Chief People and Culture Officer