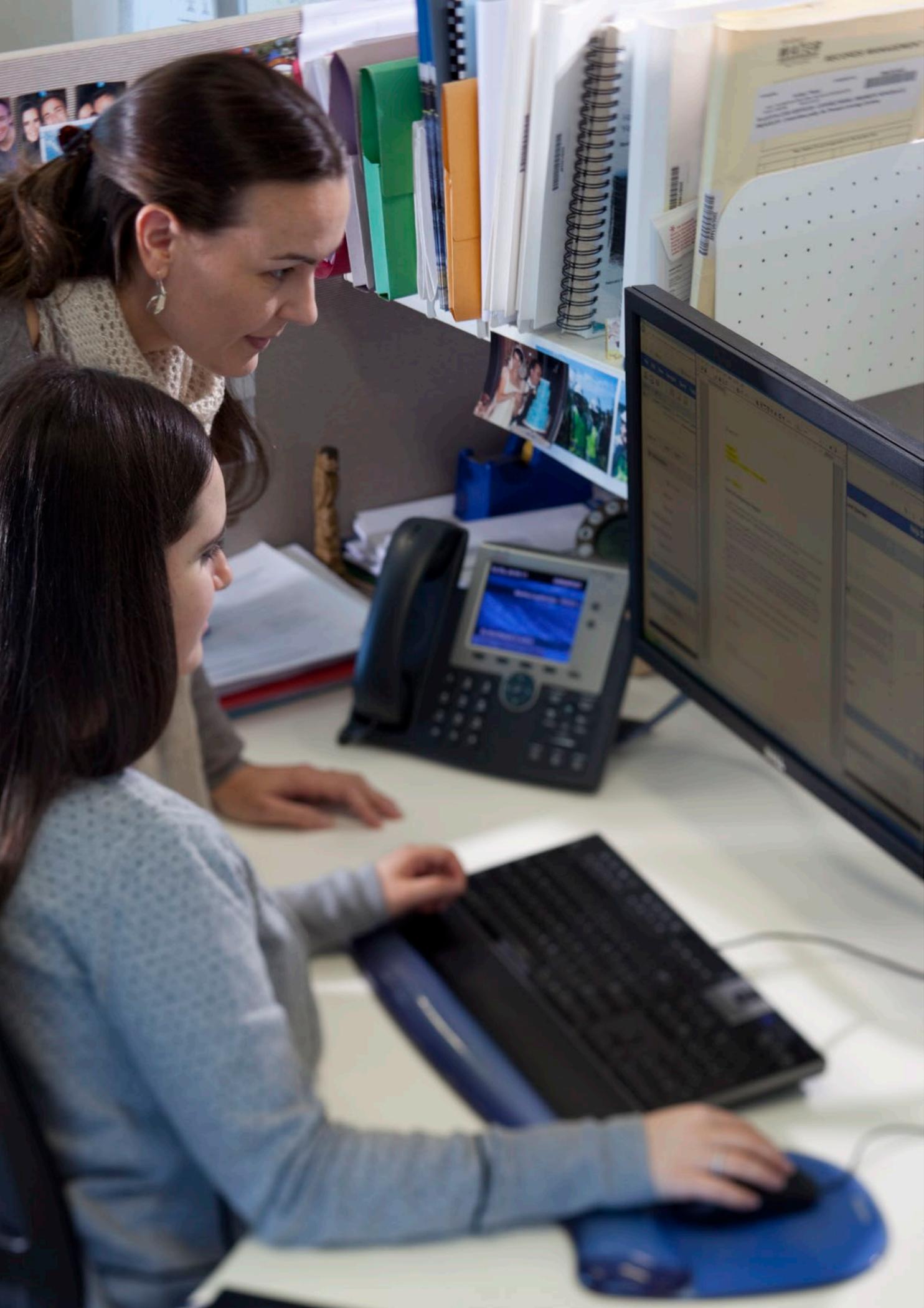


# Living our values

## Principles for ethical decision making





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# Managing Director's message



**At Sydney Water we recognise our role as custodians of public trust and confidence. We are committed to fostering the highest standards of safety and service. Each and every one of us plays an important role in the way we conduct ourselves demonstrating ethical behaviours as we go about our work.**

Sydney Water's *Principles for ethical decision making* sets out a common understanding of our values and the signature behaviours expected of us. Our values and Principles for ethical decision making are designed to guide us in how we work and interact with each other and the community.

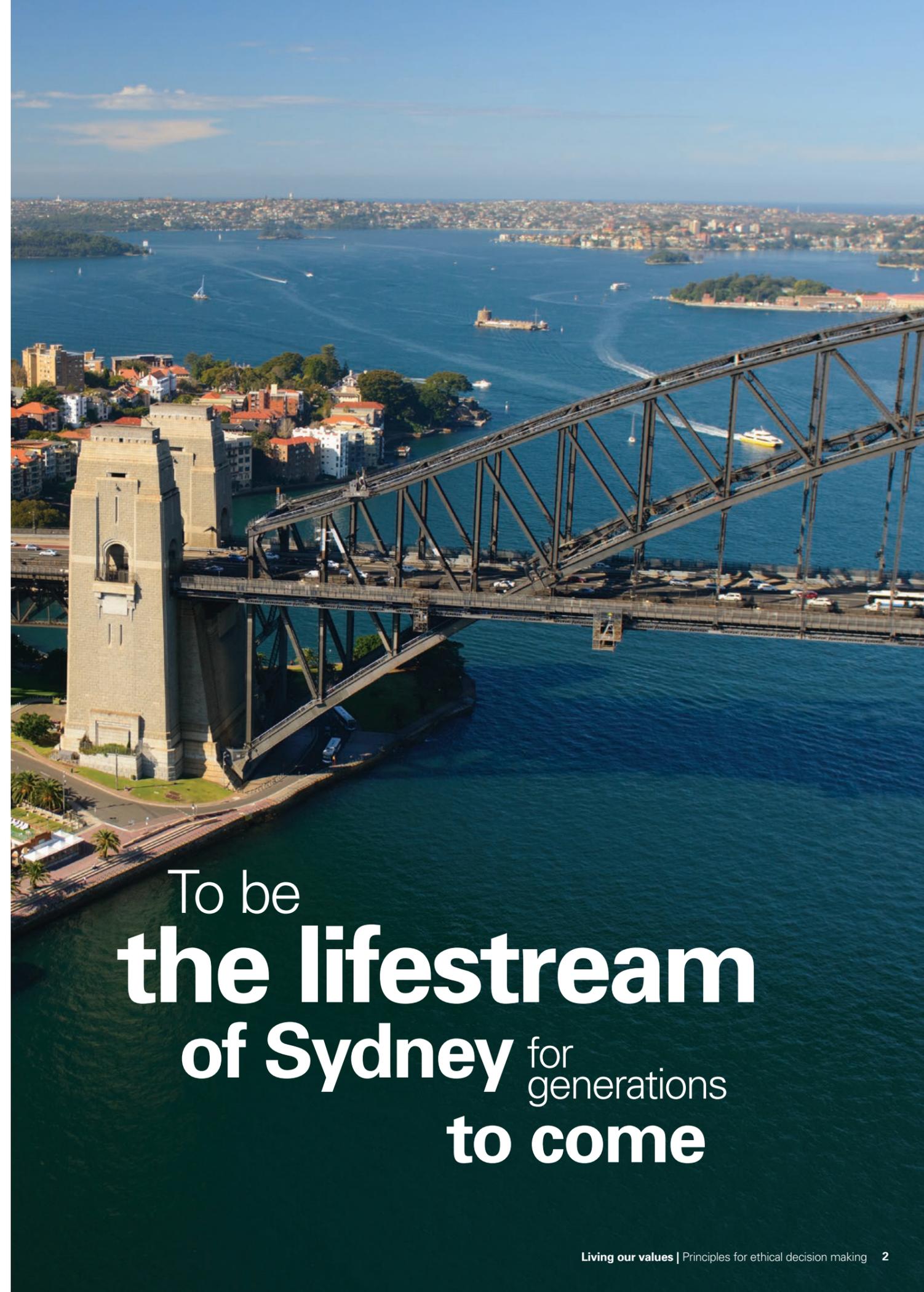
They help us understand Sydney Water's standards for honest and ethical behavior so we can make the right decisions and speak up when necessary.

Through embracing our values and signature behaviours, and using our principles for ethical decision making, you can be confident that you are doing everything you can to meet our responsibilities to the public and each other. The corporate policies and relevant legislation will also help you do this.

If you are making a decision on behalf of Sydney Water, or making a decision that may impact on Sydney Water, always do so with our values and signature behaviours in mind.

Our vision to be the lifestream of Sydney for generations to come relies on us to be the best that we can be, and maintain public trust and confidence. I encourage you to consider this personal commitment in everything you do.

**Kevin Young**  
Managing Director



To be  
**the lifestream**  
**of Sydney** for  
generations  
**to come**

# Our principles for ethical decision making

Every organisation, including Sydney Water, recognises that personal values can differ between individuals.

To enable an organisation to demonstrate a consistent set of behaviour standards that minimise risks, leaders establish a set of shared values and standards through the organisation's Ethical Framework.

The *Principles for ethical decision making* help us make the right choices while at work. The Board and Executive of Sydney Water recognise the importance of establishing and maintaining an ethical culture. That's why our ethical framework underpins our value - 'Achieving as one team honestly and ethically'.



## Sydney Water's Ethical Framework

Ethics are the principles by which our actions are judged - good or bad, right or wrong. Ethical behaviour is typically associated with principles such as integrity, fairness, honesty and merit. Importantly, being ethical means more than just avoiding illegal or corrupt behaviour. It is also about how we manage 'grey areas' where the best course of action may not be obvious.

## Rules or guidelines?

To establish clear expectations about what is expected from you, the *Principles for ethical decision making* refers to some of our key policy requirements. We must all comply with the law, so the *Principles for ethical decision making* does not repeat the various legal requirements that apply. We are bound by the provisions of Sydney Water policies and procedures. These set the minimum standards of conduct and controls to reinforce our values, especially in specific risk areas such as conflicts of interest or the receipt of gifts and benefits.

The pace of change today dictates that no organisation can depend on a rule book so we need to use values based decision making. To help you deal with these challenges, the *Principles for ethical decision making* helps guide your approach.

## How we do things around here

The *Principles for ethical decision making* applies to all Sydney Water staff, contractors, consultants, suppliers, delivery partners and service providers who do work for, or on behalf of, Sydney Water.

## Consequences of not following our Ethical Framework

Depending on the nature and circumstances of any breach, Sydney Water will take action in accordance with the Disciplinary Policy or its contractual rights.

Staff who have contributed to, or concealed a breach, or failed to take action against unethical conduct will be held accountable.

Subcontractors, business partners, suppliers and third parties who knowingly act unethically may have their contracts terminated.

An ethical culture is visible when the everyday business decisions and actions of our people align with Sydney Water's values and signature behaviours.

# Our values

Our values are embedded in our *Principles for ethical decision making*. They demonstrate what we stand for and guide our behaviours and decisions at work.



## Have the customer at the heart of everything we do

- Listen, understand and communicate
- Tailor solutions to different needs
- Understand our personal contribution to customer value
- Keep it simple and make it easy
- Show the customer that we care



## Achieve as one team honestly and ethically

- Seek and provide feedback respectfully across the business
- Build on each other's ideas
- Demonstrate accountability and trust
- Live the strategy
- Celebrate and reward success
- Believe how we do it is just as important as what we achieve



## Care for one another, the environment and the community

- Speak up with honesty and openness
- Connect and collaborate with people
- Take accountability
- Think of consequences: people, customers, community, environment



## Make every decision and every dollar count

- Build capability to enable good decisions
- Believe it is okay to stop and change track, agility at mid-point is promoted
- Understand the value of a dollar considering community, environment and benefits
- Seek to deliver more value
- Focus on whole of life, whole of business, real need, real outcome
- Build process and implement
- Make decisions at right level
- Seek clear benefits, measures and outcomes



## Create new and better ways of doing things

- Look for ideas outside of normal sources
- Seek a diversity of views to improve problem solving and definition
- Try things that don't have a guaranteed success (fail fast)
- Learn from failures
- Take time to think
- Feel okay to ask stupid questions
- Don't dismiss the answer

# Our signature behaviours

The signature behaviours are what we expect to see and hear as we live our values. The signature behaviours can be used to help resolve tensions that may exist between the corporate values.

Positive attitude

**Change ready**  
Improvement  
**Insight**

## Focus on solutions

- Demonstrate a positive outlook
- Find a way to make things better
- Display openness to suggestions, new ideas and new ways of working

Participation  
**Collaboration** Courage  
Respect

## Stand up and contribute

- Actively participate and work with others to make it happen
- Challenge respectfully
- Share knowledge and offer opinions

Integrity  
Transparency Honesty  
**Trust**

## Do what you say

- Agree what to do and by when; get it done and do it well
- Demonstrate openness and honesty
- Regularly update, inform and share information

Empathy  
**Encouragement**  
Communication  
**Cooperation**

## Support and encourage

- Actively listen, empathise and build relationships
- Make time for others and help people to be the very best they can be
- Show care and concern for others

Ownership  
Accountability  
**Results**  
Accomplishment

## Own the outcome

- Own your role and accountabilities – fulfil them
- Champion business or team decisions and accomplishments
- Hold self and others to account for actions and behaviours, respectfully

# Our responsibilities

Withstand   
the pressure to  
'go along to get along'

We are all  
on show 

## How we contribute to our ethical culture

All staff at Sydney Water are accountable for their work and behaviour in the workplace. As Sydney Water staff you are expected to:

- Speak up when you see or suspect unethical behaviour
- Declare any personal interests that may adversely affect your work
- Protect Sydney Water's reputation, commercial interests and public confidence in our operations
- Take personal responsibility for our safety and wellbeing by looking out for each other
- Follow the law and approved policies and procedures
- Base decisions on evidence and merit, Sydney Water's values and signature behaviours
- Use Sydney Water resources efficiently and effectively
- Use Sydney Water's assets and information (including confidential information) responsibly
- Value transparency and be open to scrutiny.

## Leading by example

Embedding our *Principles for ethical decision making* depends on our leaders' actions. Our leaders have additional accountabilities under this framework and play a central role in role modelling and promoting appropriate workplace behaviour.

We expect our leaders to:

- Lead by example, be held accountable for safety performance and create a workplace culture that recognises the safety of our people is paramount
- Lead by example, and be a role model of our values and signature behaviours (ie 'walk the talk')
- Provide an environment that encourages managers, staff and contractors to speak up about improper conduct
- Recognise staff that exhibit our values and signature behaviours and contribute to a constructive culture
- Initiate early conversations with staff and contractors about issues of concern
- Manage workplace situations that may place pressure on staff to engage in unethical conduct. This includes confronting any excuses for unethical conduct, such as 'we've always done it this way', or 'no-one will notice'
- Keep promises and commitments
- Be an active manager and shape a positive workplace culture. This is done by managing risks pro-actively, supervising staff, adhering to policies and delegations and safeguarding public funds. It's a manager's job to know what's going on, when to support people, when to step in, and when to take action
- Design and align systems of work and processes to support the corporate strategy through the delivery of the corporate plan.

## The role of our partners

Sydney Water relies on the services of contractors, consultants, suppliers, delivery partners and service providers to help deliver vital services to our customers and the community. Some of our partners are the face of Sydney Water, interacting with our customers to provide advice, planning, as well as delivering capital works, operations and maintenance activities and a range of other services such as metering reading. This means Sydney Water's reputation depends on their ethical behaviour.

We expect anyone who undertakes work for or on behalf of Sydney Water, to understand and follow the *Principles for ethical decision making*, and comply with Sydney Water's Business Ethics Guide which is available on Sydney Water's website.

**Safeguarding against corruption requires everyone to play their part by being alert to possible signs of fraud.**

**Sydney Water will take action against any staff member, contractor or supplier found to be engaged in fraud and corrupt activities. Serious unethical conduct, such as fraud and corruption, can be particularly damaging to our reputation and the public's confidence in us.**

**Details of the Fraud and Corruption Prevention Policy can be viewed on iConnect, Sydney Water's intranet.**

# Recognising shades of grey

**Sometimes identifying the right decision is easy because there is a clear distinction between right and wrong (for example falsifying a document or stealing).**

Ethical decisions typically require competing arguments to be evaluated. They can sometimes involve tension between personal and organisational values. Making an ethical decision involves resolving 'shades of grey' as they relate to Sydney Water's values.

In some cases, the difficulty arises from choosing between competing 'rights'. For example:

- Should you compromise on a safety procedure to meet an urgent project deadline that will benefit a customer?
- Should you carry out an instruction from your manager if you think there is a more efficient way of doing things?
- Should you approve an exorbitant contract variation in order to quickly restore service to a group of customers?

While we are very good at judging right and wrong in situations where we are not personally involved, in the workplace there are other issues at play.

Sometimes good people make poor decisions because of workplace pressures such as time, peer or budget pressures. In these situations, challenging yourself and others may seem difficult, for example, it may appear that you are questioning honesty and integrity.

We want to encourage conversations to explore dilemmas to provide support and clarity. For example, the first question above may seem like a dilemma to some, however for Sydney Water there is a very clear approach – there is no task so urgent and no service so important that we cannot take the time to do it safely.

These are the situations where the ethical decision making model in this document will help. The three step decision making model, Recognise – Assess – Act, describes various ways in which ethical issues can be discussed, resolved or escalated.

If in **doubt**  **check it out**

## Recognise, Assess, Act decision making model

### Recognise

Take the time to think and consider:

- What are the facts? (understanding that you are in an ethical dilemma is an important first step)
- Who could be affected?
- Is there a conflict of interest?
- Why am I feeling uneasy about the situation?
- Which Sydney Water values and signature behaviours are threatened by this?
- What do our policies, procedures, laws and regulations say about this matter?
- Do I have authority to act?

### Assess

Consider:

- What are the potential options and their consequences, together with potential barriers? One option might be to have an open talk with the person involved. You could raise the matter with your manager or colleagues, or discuss it at a team meeting. You could ask an internal subject matter expert, or identify the issue as part of a risk management process.
- What are the key benefits and risks of each option?
- How has this been handled before?
- Who do I need to inform or seek advice from?
- Am I prepared to stand by my decision?
- If you need further help, ask your Business Partner from People Leadership and Culture, or the Manager Risk & Resilience, or the Manager Internal Audit.

### Act

Take a course of action:

- Escalate or report the issue if required, choosing a course of action based on your informed assessment
- Document your decision so that others can understand your course of action (for example reasons and who you consulted)
- Update existing policies or work practices based on the new experience.

**A helpful test is to ask yourself, 'Would you be comfortable if your family knew about the decision, or if it was reported in a newspaper?'**

# Acting on unethical behaviour

Sydney Water staff can raise issues of concern such as suspected unethical behaviour in a number of ways. Unethical behaviour can include harassment, bullying, corrupt behaviour, incompetence or mismanagement, and serious/substantial waste.

Sydney Water is committed to an open, accountable workplace where staff can raise concerns without fear of reprisal. Sydney Water will not tolerate any reprisal against those who report improper conduct. See the Internal reporting policy for more detail.

## If you want to raise concerns about unethical behaviour

Your options include raising the matter:

- with your manager or Manager Once Removed (MOR)
- directly with your General Manager
- with a representative from People Leadership and Culture, Internal Audit or Risk & Resilience
- via the independently managed Corruption Hotline on **1800 500 965**.

If you think the conduct you have witnessed is not serious enough to warrant escalation to management, or it can be resolved with a frank conversation, you could raise the matter with the person(s) involved.

## If you are in doubt, or have a question or concern, do not avoid the issue. Reach out and speak up.

In the first instance you are encouraged to raise the issue within the organisation. However, if you have exhausted these options or:

- you feel that your concerns won't be heard or addressed within Sydney Water
- you are concerned about Sydney Water's ability to maintain the confidentiality of your complaint or protect you from reprisal action.

There are four options to consider if you want to go outside Sydney Water.

- The Independent Commission Against Corruption, which can be reached on **(02) 8281 5999** or [www.icac.nsw.gov.au](http://www.icac.nsw.gov.au).
- The NSW Ombudsman, which can be reached on **(02) 9286 1000** or [www.ombo.nsw.gov.au](http://www.ombo.nsw.gov.au).
- The Auditor General's office, which can be reached on **(02) 9275 7100** or [www.audit.nsw.gov.au](http://www.audit.nsw.gov.au).
- The Office of the NSW Information Commissioner, which can be reached on **1800 472 679** or [www.ipc.nsw.gov.au](http://www.ipc.nsw.gov.au).

# Key policies and procedures

Sydney Water has many policies and procedures that set out detailed requirements about workplace conduct. Staff must be familiar with, and implement the policies that relate to their duties. To avoid unnecessary duplication, the policies are not included in this document.

Your accountabilities under each of these policies can be viewed on iConnect, Sydney Water's intranet. The key policies that have ethics implications are listed here.

- **Absence and attendance reporting policy**
- **Acceptable use of technology policy**
- **Business ethics guide**
- **Conflicts of interest policy**
- **Delegations manual**
- **Disciplinary policy**
- **Discrimination and harassment**
- **Drug and alcohol policy**
- **Fair treatment (grievance resolution) policy**
- **Fraud and corruption prevention policy**
- **Gifts and benefits policy**
- **Health and safety policy**
- **Internal reporting policy**
- **Media and social media policy**
- **Privacy policy**
- **Procurement policy**
- **Records management policy**
- **Risk management policy**
- **Staff personal information policy**
- **Workplace conduct policy**

# Invitation to test your ethical judgement

## Scenario: Dead beat data

Betty, a lifelong friend of yours outside of work, has gone through a nasty divorce that involved legal action. Her ex-husband Greg, who you also know, is not making the child support payments that have been ordered by the family court and you know she is doing it tough. Betty knows that you work in Customer Services at Sydney Water.

One day, Betty calls you and says “I’ve heard that Greg has bought an expensive new apartment with the money that he should have been paying to me and the kids. I need to track him down so my lawyer can get in touch with him. Any chance you could look him up on the Sydney Water database for me?”

## What would you do?

- A.** Quietly look up the details and pass them on to Betty. Besides, the only person that’s going to be hurt is Greg who is avoiding his responsibilities anyway.
- B.** Look up the details but send only the street and suburb to Betty anonymously. Betty will still have to do a little detective work on her own. She could have got that information anywhere.
- C.** Despite your friendship with Betty, you know this is an inappropriate use of Sydney Water systems and confidential customer data. You also know that this misuse could impact Sydney Water’s reputation. You politely decline and let Betty know it’s against Sydney Water policy to provide this information and raise the matter with your manager. You also suggest to your manager that one of your colleagues be asked to assess Betty’s eligibility for the BillAssist program.
- D.** Politely decline, but you look up the details anyway. You call Greg from a quiet room and let him know he should be making his payments.

**Answer:** The most suitable answer is C.

While it is understandable that you might sympathise with your friend Betty in this situation, this is an inappropriate misuse of Sydney Water systems and confidential customer data. Misusing customer data also has the potential to impact Sydney Water’s reputation and breach our Operating Licence. It also runs counter to our value of ‘Have customer at the heart of everything we do’.



# Frequently asked questions

## Q What is ethics?

In everyday language, ethics is about thinking and doing the right thing.

It is typically associated with principles such as integrity, fairness, honesty and merit. Importantly, being ethical means more than just avoiding illegal or corrupt behaviour. It is also concerned with how we deal with 'grey' areas where the best course of action may not be obvious but we make the time to consider how Sydney Water's values can guide our decisions and actions.

## Q What does unethical behaviour look like at Sydney Water?

Sometimes unethical behaviour is easy to identify because it involves an obvious breach of the law or a Sydney Water policy. But it is also common for reasonable people to disagree about whether behaviour is right, wrong or some shade of grey in between. However, unethical conduct typically has one or more of the following characteristics:

- self-interest is placed ahead of Sydney Water's interests
- Sydney Water's values, signature behaviours or policies are breached
- information, resources or assets are misused
- Sydney Water's reputation is placed at risk
- decisions are made without authority, consultation or oversight
- failure to speak up when someone does the wrong thing.

A helpful rule of thumb is to ask yourself if you would be comfortable if your family knew about your choices, or if your decision was reported in a newspaper. If not, there is a good chance that the behaviour is unethical.

## Q Why does Sydney Water need an Ethical Framework?

Sydney Water is an important custodian of public trust. Our customers rely on us to provide essential services across a large, complex network. With this trust comes an expectation that Sydney Water and its staff will meet certain standards of behaviour and operate as a responsible business.

An Ethical Framework helps us to set and embed these behavioural standards. It also provides a means for protecting staff that have to make difficult decisions.

Finally, an effective Ethical Framework will also help to make Sydney Water a fair and enjoyable workplace and facilitate the constructive 'blue' culture that staff have told us they want.

## Q Isn't this just more rules and red tape?

No. We've made a concerted effort to not repeat existing Sydney Water 'rules' in the guide. Sydney Water has policies and procedures that contain plenty of rules that you are expected to follow – but they don't need to be in the principles.

The principles are built around our corporate values and signature behaviours. By communicating an explicit set of values we can encourage consistent decision-making and appropriate resolution of ethical dilemmas when there are no rules to follow. The intention is that the *Principles for ethical decision making* be a guide to making better decisions, not a rulebook.

## Q What happens if I breach Sydney Water's ethics?

Our values and signature behaviours are not just slogans. We take them seriously and require staff to reflect them in day-to-day work practices.

Depending on the nature and circumstances of any breach, Sydney Water may take action in accordance with the Disciplinary Policy or its contractual rights.

This may include taking action against managers if they have contributed to or concealed a breach, or failed to take action against unethical conduct.

However, being ethical is not about being perfect. Often, navigating an ethical dilemma is about weighing up various options, seeking advice, and recording the circumstances and reasoning behind a decision. And finally it's about being accountable for the decisions and actions taken.

## Q My job has nothing to do with ethics. Do I need to worry about this document?

We are all confronted with ethical dilemmas.

Everyone has a role to play in sustaining a High Performance Culture, which involves making the right choice in everyday situations such as:

- dealing with customers
- working with each other
- using resources such as plant, equipment, tools, computers and vehicles
- being accountable for decisions made.

## Q What if I see something unethical and can't go to my manager?

The guide sets out alternative ways to report or escalate any concerns that you might have. This may involve escalating a matter beyond your manager, reporting anonymously or taking your concerns to an outside party.

Mostly importantly, doing nothing should not be an option.

## Q What support is available to help me work through ethical dilemmas?

There are internal as well as external contacts you can reach out to for help. You may consider exploring the dilemma:

- with your manager or Manager Once Removed (MOR)
- directly with your General Manager
- with a representative from People Leadership and Culture, Internal Audit or Risk & Resilience.

There are four options to consider if you want to go outside Sydney Water:

- The Independent Commission Against Corruption, which can be reached on (02) 8281 5999 or [www.icac.nsw.gov.au](http://www.icac.nsw.gov.au).
- The NSW Ombudsman, which can be reached on (02) 9286 1000 or [www.ombo.nsw.gov.au](http://www.ombo.nsw.gov.au).
- The Auditor General's office, which can be reached on (02) 9275 7100 or [www.audit.nsw.gov.au](http://www.audit.nsw.gov.au).
- The Office of the NSW Information Commissioner, which can be reached on 1800 472 679 or [www.ipc.nsw.gov.au](http://www.ipc.nsw.gov.au).

