H&H Care SA Pty Ltd	**Form16.** Worker Conduct Boundaries and Client Money and Property **Australian Government Support at Home Program**	
Doc No: Form16	**Version No: 01**	**Version Date: 24/10/2026**

Policy and procedure 16
H&H Care SA Pty Ltd | Support at Home services

This policy sets out expected worker conduct, professional boundaries and safeguards for client money, purchases, keys and property. It establishes clear limits, accountable records and prompt reporting of concerns to protect clients and workers.

Document control	Details
Policy number	HH SAH CONDUCT 016
Version and status	1.0 — Draft for Director approval
Prepared	24 October 2026
Policy owner	Director and Service Coordinator
Approved by	Huy Le, Director — signature: _____
Effective date	24 October 2026
Next review	12 months after approval, or earlier following relevant change
Applies to	Directors, managers, employees, nurses, volunteers where engaged, agency workers and approved contractors in the service relationship

1 Purpose and scope

Workers must act honestly, respectfully and safely, recognising the power imbalance in a care relationship. Warm, culturally responsive care must remain professional and directed to the client's needs. Client agreement does not make exploitation, unlawful conduct or unsafe care acceptable.

This policy applies to Support at Home services delivered on behalf of The Fig Trees and other approved registered providers, including contact outside scheduled visits when it arises from the care relationship. It operates with the Aged Care Code of Conduct, professional standards, Policies 1 to 15 and the current brokerage agreement; it does not replace or amend them.

2 Responsibilities

The Director approves conduct controls, manages declared conflicts and serious concerns, and ensures an unconflicted reporting route. The Coordinator authorises task arrangements within delegation, maintains transaction/property records and checks reconciliations. Workers protect client rights and property, disclose conflicts and gifts, follow approved duties and report mistakes or concerns immediately.

The registered provider retains its statutory duties and receives relevant oversight information and incident reports. Agree reporting contacts and approvals with The Fig Trees in writing. Workers retain individual professional obligations; management approval cannot authorise exploitation, criminal conduct or practice beyond lawful scope.

3 Core conduct expectations

Respect client choice, identity, privacy, dignity and supported decision-making. Deliver competent care with honesty and transparency, speak up about risks and take appropriate steps to prevent and respond to harm. The complete official Code must be supplied at induction; this policy translates expectations into H&H Care working rules rather than replacing the Code.

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Professional behaviour and personal boundaries

4 Daily professional conduct

- Arrive fit for work, identify yourself, seek consent and follow the authorised plan. Report delays, missed tasks and changes honestly. Never falsify times, notes, receipts or signatures.
- Use respectful language, protect intimate privacy and explain tasks. Do not threaten, ridicule, discriminate, punish refusal or pressure clients because a visit is running late.
- Work within competence, current instructions and available supervision. Decline and escalate an unsafe or unapproved task rather than improvising.
- Maintain confidentiality in conversations, records, photographs and electronic communication. Do not discuss clients publicly or share identifiable information on personal accounts.
- Treat clients, families, colleagues and other providers professionally. Raise care or billing concerns through appropriate channels without suppressing complaints or independent advocacy.
- Do not work impaired by alcohol, drugs, illness or fatigue. Report any prescribed medicine or health effect that compromises safe performance through confidential management pathways.

5 Relationships and outside contact

Do not develop sexual, romantic, exploitative or secret personal relationships with clients or use access to satisfy your own emotional, financial or social needs. Do not involve clients in personal disputes, seek personal favours or create dependence by claiming only you can care for them. Be alert to requests for secrecy and special treatment.

Disclose any existing family, friendship, business, community or other dual relationship before allocation and whenever it changes. The Director assesses conflict and safeguards, including alternative allocation, documentation or independent review. A shared language or community background is not itself misconduct; actual risks must be identified and managed respectfully.

Use approved business communication. Under The Fig Trees agreement, clients must not be given personnel's private phone numbers, social media accounts or addresses without the registered provider's explicit agreement. Do not add clients as personal social media contacts, arrange private paid visits, sell products or take service payments personally. Any necessary communication exception requires written approval and a documented safe method.

Do not bring friends, children, visitors or pets to a client's service without a separately assessed and approved arrangement and client consent. Do not use the client's home, Wi-Fi, food, vehicle or belongings for personal purposes outside expressly agreed incidental arrangements. Ordinary hospitality must not become an entitlement or influence care; apply the gift and benefit rules.

Gifts benefits conflicts and legal documents

6 Gifts and benefits

Workers must never solicit gifts, cash, loans, tips, discounts, referrals or personal benefits. Decline cash, substantial gifts and benefits linked to preferential care or another obligation. Explain politely that professional rules protect both parties. Record the offer and notify the Coordinator even where declined.

A modest token such as shared chocolates may be considered only where lawful, culturally appropriate, free of pressure and approved under the applicable contract and H&H process. There is no universal statutory dollar allowance. The supplied Fig Trees agreement requires prior written provider consent for relevant benefits; Director approval alone does not override that condition. If approval is absent or uncertain, do not accept and seek guidance.

If an item is left unexpectedly or cannot safely be refused immediately, report it, keep it secure without using it and arrange documented return or other approved disposition. Record the offer, estimated value, relationship, decision, approvals and outcome. Directors must have their own conflicts reviewed by an unconflicted delegate or independent adviser where needed.

7 Financial and legal relationships prohibited for workers

- Do not borrow from or lend to clients, share investments, purchase client assets for personal gain, seek guarantees or use the client's money to cover staff or business expenses.
- Do not ask to be named in a will, receive a bequest through the care relationship, become an attorney/executor or obtain authority over the client's finances. Refer any unsolicited proposal immediately for independent advice and conflict management; do not accept the role yourself.
- Do not sign on behalf of a client or witness wills, financial authority, property transfer or similar legal documents as part of the support role. Refer the person to an independent qualified service.
- Do not offer financial or legal advice, choose investments, change account beneficiaries or instruct a bank as though you hold authority when you do not.
- Do not enter private work, accommodation, rental or business deals with a client or their family arising from the service without prior organisational review; exploitation and unlawful arrangements remain prohibited regardless of approval.

8 Client choice and contractual restrictions

Do not solicit clients or personnel contrary to the agreement or disclose confidential business information. However, a restraint or reputation clause must not be used to silence safeguarding, billing or care concerns or prevent lawful advocacy. Refer conflicts between contract wording and rights or reporting duties to the Director for prompt clarification and advice. Support legitimate questions and client-led provider choices through authorised, independent information pathways.

Authorised shopping and client money

9 Set up the assistance arrangement

Money handling is permitted only for an authorised service with client consent and a documented method, limits, records and reconciliation. Prefer arrangements where the client makes payments directly and retains control. Do not treat a general shopping task as authority to operate bank accounts, withdraw cash or spend without limits.

Record the approved purpose, maximum amount or agreed list, who supplies funds, receipt and change arrangements, any authorised representative, and what to do if the client cannot confirm reconciliation. Verify representative authority for the relevant transaction; family or emergency-contact status alone does not establish financial decision-making power.

Workers must not request, record, retain, disclose or use a banking password, PIN, one-time code or online banking credentials. Where a client cannot transact independently, seek an authorised bank or legal support pathway through the Coordinator. Do not solve the problem by using the client's identity or asking another worker to enter the PIN.

10 Transaction procedure

- Confirm the client's requested items, budget and consent. Clarify substitutions and costs before purchase. Accept funds only under the approved arrangement and record the amount and method.
- Count cash with the client or authorised person where practical and confirm the opening amount. Keep each client's money separate from personal and other clients' funds.
- Buy only authorised items and obtain itemised receipts. Do not add personal purchases, loyalty rewards for yourself or an undisclosed commission. Seek approval for material substitutions or extra expenditure.
- Promptly return receipts, purchases and all change, ordinarily before the visit ends. Reconcile opening funds minus actual authorised expenditure against change returned; explain the result.
- Obtain the client's confirmation in an accessible way. A signature is not mandatory where inappropriate; record the alternative confirmation and source. If the person cannot confirm, use the pre-approved independent check, not an invented signature or an implicated person.
- Record the worker's authentication and reconciliation check. Report missing receipts, shortages, unexpected charges or a disputed purchase immediately; preserve evidence and follow incident/safeguarding pathways.

Do not advance personal money or keep client funds for a future shift as a routine workaround. Any unavoidable exceptional temporary custody requires immediate manager direction, lawful authority, secure storage and a documented handover, not informal retention at home. If no safe authorised arrangement exists, pause the transaction and seek an alternative without neglecting essential needs.

Property keys access and concerns

11 Client property and equipment

Respect ownership and use belongings only for the authorised purpose with consent. Do not remove, borrow, sell, donate, discard or photograph property without the appropriate authority and documented purpose. A claim that an item is unwanted or a gift still requires the relevant boundary and approval checks.

Record any property entrusted to H&H Care, including description, condition, purpose, person receiving, date, storage and return. Secure medicines under the medication procedure rather than treating them as ordinary property. If damage occurs, protect people, notify the manager and client appropriately and record facts. Do not conceal the event, privately replace evidence or promise compensation outside authority; contractual liability and insurance require management assessment.

12 Keys key safes and access devices

Use keys or access codes only under the client's approved consent and access plan. Record issue, authorised holder, purpose, return and any loss. Do not label a key with a full address, make copies, share codes or allow another person entry without authority. Store codes securely in the approved system, not in public roster comments or visible personal notes.

Lock and secure the home as agreed, respecting the client's wishes and safety. Key access is not general permission to enter at any time or enter against refusal. Follow the no-answer plan and emergency procedures; do not force entry. A lost key, exposed code or unauthorised access requires immediate manager notification and risk assessment, including contact with the client/provider and security changes where needed.

13 Reporting and responding to concerns

Immediately report suspected theft, coercion, missing money, inappropriate gifts, boundary concerns, sexual conduct, privacy breaches or falsified records. Call 000 for an emergency. Follow Policies 9 and 11 for actual, alleged and suspected incidents, preserving evidence and protecting essential care. Do not wait for proof, confront a suspected perpetrator unsafely or attempt a private settlement.

The Director or unconflicted delegate coordinates with The Fig Trees, assesses SIRS and other reporting requirements, protects the client, considers temporary duty restrictions and investigates fairly. Stealing or financial coercion by a staff member is a specific SIRS category; do not assume every property discrepancy is automatically reportable or that non-SIRS concerns may be ignored.

Inform the client through appropriate open disclosure and complaints pathways and offer independent advocacy. Do not retaliate against clients or workers who report in good faith. Staff must cooperate with investigations without altering evidence or disclosing confidential details unnecessarily. Confirm ongoing care and corrective actions rather than simply removing a worker from the roster.

Client money and property records

Client transaction and reconciliation record

CONDUCT F01 | Client/identifier: _____ Date/worker: _____
Approved task limit and consent reference: _____
Person providing funds and relevant authority: _____
Opening funds amount/method and time: _____
Shopping list/substitutions approved: _____

Purchase and receipt reference	Amount	Client-approved variation
_____	_____	_____
_____	_____	_____
_____	_____	_____

Total spent: _____ Change returned: _____ Time: _____
Reconciliation: opening funds minus spending = change: _____
Receipts and goods returned to: _____
Client confirmation method or reason unavailable: _____
Independent check if required and authority: _____
Discrepancy or missing receipt response: _____
Worker authentication: _____ Manager check/date: _____

Property and key custody record

CONDUCT F02 | Client/identifier: _____
Item description and unique reference: _____
Condition on receipt: _____
Purpose consent and limits on access/use: _____
Received from/to by whom/date/time: _____
Approved secure storage location: _____
Return or handover to/date/time: _____
Condition on return and acknowledgement: _____
Loss damage or access concern and action: _____
Manager/provider notified and incident reference: _____

Do not record actual key-safe codes on a broadly accessible register or physical key label. Keep code information in the separately controlled location. Records may be electronic if audit history and accountability are preserved.

Declarations and worker acknowledgement

Gift benefit and conflict declaration

CONDUCT F03 | Worker/role: _____ Date: _____
Client/relationship and type of concern: _____
Gift benefit conflict or existing relationship described: _____
_____
Value or nature of proposed benefit: _____
Offered by and circumstances including any pressure: _____
Immediate action accepted/declined/held for return: _____
Director or unconflicted reviewer: _____
Provider consent reference where required: _____
Decision reasons and safeguards: _____
_____
Return/disposition and evidence: _____
Review date and ongoing restrictions: _____
Worker acknowledgement and reviewer authentication: _____

Worker conduct acknowledgement

CONDUCT F04 | To be completed after induction and discussion. A signature records understanding; it does not waive rights or replace practical competence.

- I have received the official Aged Care Code of Conduct and this policy and can access current instructions.
- I will respect client rights, consent, privacy and choice and work within authorised tasks and competence.
- I will maintain professional boundaries, declare conflicts and gifts and use approved communication channels.
- I will not seek personal benefits or use client banking credentials and will follow approved shopping, property and key controls.
- I will report concerns, mistakes and suspected exploitation promptly, preserve evidence and cooperate with fair review.
- I know how to obtain guidance or report to an unconflicted contact, the registered provider or an external authority where appropriate.

Worker name and signature: _____ Date: _____
Induction facilitator and role: _____ Date: _____
Questions support or adjustments required: _____
_____
Follow-up owner and due date: _____

No acknowledgement authorises conduct prohibited by law, professional standards or the contract. Workers may ask questions, seek advice and make protected disclosures without retaliation.

Oversight implementation and references

14 Monitoring training and fair action

At induction and when duties change, train workers using scenarios on cash discrepancies, social media, unsolicited gifts, family conflicts, client refusal, lost keys and private work requests. Discuss cultural hospitality respectfully and demonstrate how to decline or seek approval without humiliating the client.

As internal controls, the Coordinator checks transactions and discrepancies promptly, reviews outstanding property/key custody at handover and exit, and escalates high-risk concerns immediately. Management reviews gifts, conflicts, financial exceptions and boundary incidents monthly and audits a risk-based sample quarterly. Check that approvals, receipts and actual delivery agree; a low number of complaints is not proof of safe practice.

Respond to breaches proportionately, protecting safety while providing procedural fairness. Actions may include coaching, supervision, duty restrictions, formal employment action and regulatory referral where required. Management approval cannot retrospectively erase prohibited conduct. Return-to-duty decisions require evidence that risks and competence gaps are addressed.

15 Records exit and implementation

Maintain declarations, transaction and property records, approvals, acknowledgements and incident links in controlled systems under Policy 8. Limit access and do not collect unnecessary full bank details, PINs or identity copies. Apply retention requirements and legal holds; do not destroy disputed receipts or relevant messages.

When a worker changes role or leaves, recover keys, access devices, records and equipment, remove system access and document handover of client property and outstanding issues. Confirm with the client/provider where security arrangements change. Do not allow continued personal access because a former worker is friendly with the client.

Before approval, confirm The Fig Trees' gift, contact and conduct requirements; appoint unconflicted approval and reporting roles; approve shopping/payment methods and limits; establish secure custody arrangements; and brief all workers and clients on relevant boundaries. Resolve conflicting requirements with management and advice before relying on an exception. Review annually and after incidents, changes or identified gaps.

16 References and related policies

Policies 1 to 15, particularly rights, privacy, incident/SIRS, safeguarding, records and workforce competence; professional conduct, clinical delegation, medication and finance procedures.

- Aged Care Act 2024 and Aged Care Rules 2025, including the Statement of Rights and Aged Care Code of Conduct; applicable professional, privacy, employment and South Australian legal requirements.
- Aged Care Quality and Safety Commission — Aged Care Code of Conduct and current worker guidance. https://www.agedcarequality.gov.au/for-providers/code-conduct
- Commission — Worker Code of Conduct information. https://www.agedcarequality.gov.au/workers/aged-care-code-conduct/aged-care-code-conduct
- Commission — SIRS reportable incident guidance for stealing or financial coercion by a staff member. https://www.agedcarequality.gov.au/providers/serious-incident-response-scheme/reportable-incidents/stealing-or-financial-coercion-staff-member
- The Fig Trees and H&H Care brokerage agreement dated 10 March 2026, including personnel contact, benefit and non-solicitation terms, and current approved variations.

Official guidance checked 24 October 2026. Specific professional or contract rules may be stricter; this policy does not rewrite them or describe every employer control as a statutory rule.

Director approval: _____ Effective date: _____

Version 1.0 — Draft prepared 24 October 2026; approval and implementation pending.