



POLICY MANUAL

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CODE OF ETHICS

Policy Brief and Overview

Our professional code of ethics policy aims to give our employees guidelines on our business ethics and stance on various controversial matters. We trust you to use your better judgment, but we want to provide you with a concrete guide you can fall back on if you're unsure about how you should act (e.g. in cases of conflict of interest). We will also use this policy to outline the consequences of violating our business code of ethics.

Scope

This policy applies to everyone we employ or have business relations with. This includes individual people such as employees, interns, volunteers, but also business entities, such as vendors, enterprise customers or venture capital companies.

What is meant by code of professional ethics?

First, let's define professional ethics: they are a set of principles that guide the behavior of people in a business context. They are essential to maintaining the legality of business and a healthy workplace.

So what is a *code* of ethics? Our code of ethics definition refers to the standards that apply to a specific setting – in this case, our own organization.

What is the purpose of a professional code of ethics?

Having our business ethics in writing doesn't mean that we don't trust our employees. We strive to hire ethical people who have their own personal standards, so we expect that a written code won't be necessary most of the time.

Every organization makes bad hires every once in a while. We also can't predict how people are going to behave. When an employee behaves, or intends to behave, in a way that's against our professional ethics, or applicable laws, we will have clear guidelines on what disciplinary actions we will consider.

The components of our code of professional ethics:

We base our business code of ethics on common principles of ethics:

- **Respect for others.** Treat people as you want to be treated.
- **Integrity and honesty.** Tell the truth and avoid any wrongdoing to the best of your ability.
- **Justice.** Make sure you're objective and fair and don't disadvantage others.
- **Lawfulness.** Know and follow the law – always.
- **Competence and accountability.** Work hard and be responsible for your work.
- **Teamwork.** Collaborate and ask for help.

Here's a more detailed overview of our code:

Respect for others

It's mandatory to respect everyone you interact with. Be kind, polite and understanding. You must respect others' personal space, opinions and privacy. Any kind of violence is strictly prohibited and will result in immediate termination. You're also not allowed to harass or victimize others.

As a general rule, try to put yourself in someone else's place. How would you feel if someone behaved a specific way to you? If the answer is "I wouldn't like it much" or "I would never let them behave like that to me", then we don't tolerate this behaviour no matter the person it comes from.

If someone, be it customer, colleague or stakeholder, is offensive, demeaning or threatening toward you or someone you know, report them immediately to HR or your manager. You can also report rudeness and dismissiveness if they become excessive or frequent.

Integrity and honesty

First, always keep in mind our organization's mission. We all work together to achieve specific outcomes. Your behaviour should contribute to our goals, whether financial or organizational.

Be honest and transparent when you act in ways that impact other people (e.g. taking strategic decisions or deciding on layoffs). We don't tolerate malicious, deceitful or petty conduct. Lies and cheating are huge red flags and, if you're discovered, you may face discipline or immediate termination depending on the damage you did.

Stealing from the company or other people is illegal. If you're caught, you will face repercussions depending on the severity of your actions. For example, if you steal office supplies, you may receive a reprimand or demotion (at a minimum), while if you steal money or data (e.g. engaging in fraud or embezzlement), you will get fired and face legal consequences. The decision is at HR's discretion on a case-by-case basis.

Conflict of interest

Conflict of interest may occur whenever your interest in a particular subject leads you to actions, activities or relationships that undermine our company. This includes situations like using your position's authority for your own personal gain or exploiting company resources to support a personal money-making business. Even when you seemingly act to the company's advantage, you may actually disadvantage it. For example, if an employee uses dubious methods to get competitor intel and raise their sales record, their action will have a positive impact on the company's revenue, but it will put us at a legal risk and promote unhealthy business practices.

If it turns out you have created a conflict of interest for yourself, you will be terminated. If the conflict of interest was involuntary (e.g. buying stocks from a company without knowing they're a competitor), we will take actions to rectify the situation. If you repeat the offence, you may be terminated.

Justice

Don't act in a way that exploits others, their hard work or their mistakes. Give everyone equal opportunity and speak up when someone else doesn't.

Be objective when making decisions that can impact other people, including when you're deciding to hire, promote or fire someone. Be sure that you can justify any decision with written records or examples. Seek and use the most objective methods in any case; for example, when interviewing candidates, ask the same interview questions to all of them and avoid judging non-job-related criteria, like dress, appearance, etc.

Also, don't discriminate against people with protected characteristics, as this is forbidden by law. If you suspect you may have an unconscious bias that influences your decisions (taking Harvard's Implicit Association Test could help you determine this), ask for help from HR.

When exercising authority, be fair. Don't show favouritism toward specific employees and be transparent when you decide to praise or reward an employee.

If you need to discipline an employee, be sure to have prepared a case that you can present to HR. You must not retaliate against employees or applicants (such as in cases when they've filed complaints) as this is forbidden by law.

Be just toward customers or vendors, too. If you think our company was in the wrong in a specific instance, don't try to cover it up or accuse the other side. Discuss with your manager to find solutions that can benefit both sides.

Lawfulness

You are obliged to follow all laws which apply to our organization. Depending on your role and profession, there might be various laws you need to observe. For example, accountants and medical professionals have their own legal restrictions and they must be fully aware of them.

When you're preparing contracts, clauses, disclaimers or online copy that may be governed by law (such as consent forms), please ask verification from [our legal counsel] before finalizing anything.

You're also covered by our WHS Policy. You must not expose, disclose or endanger information of customers, employees, stakeholders or our business. Always follow our Privacy Policy too.

Following laws regarding fraud, bribery, corruption and any kind of assault is a given. You are also obliged to follow laws on child labour and avoid doing business with unlawful organizations.

If you're not sure what the law is in a specific instance, don't hesitate to ask HR or our legal counsel.

Competence and accountability

We all need to put a healthy amount of effort in our work. Not just because we're all responsible for the organization's success, but also because slacking off affects our colleagues. Incomplete or slow working might hinder other people's work or cause them to shoulder the burden themselves. This comes in direct conflict with our respect and integrity principles.

We also expect you to take up opportunities for learning and development, either on-the-job or via educational material or training. If you are unsure how you can achieve this, have an open discussion with your manager.

Also, take responsibility for your actions. We all make mistakes or need to make tough decisions and it's important we own up to them. Failing to be accountable on a regular basis or in important situations (e.g. a crucial mistake in our financial records) will result in termination. If you take responsibility and come up with ways to fix your mistakes where possible, you will be in a far better position.

Teamwork

Working well with others is a virtue, rather than an obligation. You will certainly get to work autonomously and be focused on your own projects and responsibilities. But, you should also be ready to collaborate with and help others.

Be generous with your expertise and knowledge. Be open to learning and evolving. If days go by without you consulting or brainstorming with anyone, you are missing out on opportunities for excellence. Instead, work with others and don't hesitate to ask for help when you need it.

GRIEVANCES, COMPLAINTS AND APPEALS PROCEDURE

Overview

It is recognised that from time to time disputes may arise. Third Age Fitness is committed to resolving all disputes between students and the organisation and its staff as quickly and as sensitively as possible.

Scope

This policy applies to Third Age Fitness and its staff and students, or persons who have demonstrated an intention to enrol as a student in our courses and workshops (hereafter referred to where ever “a student” is referenced), regardless of the location of the workshop or course at which the grievance or complaint has arisen, the student’s place of residence or the student’s mode of study. A student who has ceased enrolment with the College will be considered under this policy and related procedure for a period of up to three calendar months after their enrolment has ceased.

Definitions

Staff - Permanent and casual employees engaged in teaching and assessment of courses at the organisation.

Appeal - A request to reconsider an academic decision made in the context of this document.

Grievance - A generic term including any expression of dissatisfaction with some aspect of a student’s experience with Third Age Fitness (including with agents or other related parties who represent or act on behalf of the organisation). In this policy, grievances will refer to those that are addressed informally and usually resolved easily (e.g. by a discussion with local staff, clarification of a misunderstanding etc.).

Complaint - A grievance that involves a formal process for resolution.

Extenuating circumstances - Relating to the welfare of the student may include, but are not limited to the following. The student is missing; has medical concerns, severe depression or psychological issues which lead the provider to fear for the student’s wellbeing; has engaged or threatens to engage in behaviour that is reasonably believed to endanger the student or others; or is at risk of committing a criminal offence. Any claim of extenuating circumstances will need to be supported by appropriate evidence.

Procedure

There are two stages in the processes associated with the resolution of a grievance, complaint or appeal with each stage representing an increase in the level of formality with which the grievance, complaint or appeal is managed.

The stages of the process are:

- Stage 1 - Informal discussion/negotiation normally between student and staff member involved, and/or the supervisor of the staff member involved.
- Stage 2 - Formal Internal Complaint, which is managed by the Director.

When escalating an appeal between and/or within a stage, students must present evidence that the previous determination was lacking in either judgement and/or due process. For each stage of the process, both the complainant and respondent have the right to be represented by a third party. For each stage of the process, both the complainant and the respondent have the right to a full explanation in writing for decisions and actions taken as part of the procedures.

Stage 1. Informal discussion/negotiation

Informal discussion/negotiation is between the student and staff member involved, and/or the supervisor of the staff member involved. Normally within 10 working days of the occurrence of the grievance or complaint the student should liaise with the staff member concerned and discuss/negotiate their concerns with a view to arriving at a mutually agreeable resolution. The student is responsible for

ensuring, in entering this informal discussion/negotiation, that they make clear the nature and grounds of the grievance or complaint and, where applicable, provide evidence to support any claims.

Following discussion, the staff member will investigate the grievance or complaint with procedural fairness and may consult with relevant academic and administrative staff, as well as students of Third Age Fitness as part of these investigations, and may engage in further informal discussion with the student. The staff member shall normally respond to the student within 10 working days of the student's initial raising of their grievance or complaint.

If the student is satisfied with the response at this stage, no further action is required. If the student is dissatisfied with the response, or the decision outcome or the time taken to resolve the matter, he or she should proceed to Stage 2.

Stage 2. Formal Internal Complaint

A student dissatisfied with the outcome of Stage 1 should lodge a formal complaint within 10 working days of the grievance or complaint's occurrence or the student's receipt of the staff member's decision at Stage 1, as applicable. The student should submit their complaint via email to carol@thirdagefitness.com.au.

The student should in this written communication:

- a) make clear the nature and grounds for his or her grievance;
- b) indicate whether or not he or she has pursued Stage 1 of this procedure, and if not briefly make clear the reasons for not doing so;
- c) provide the date of the initial decision (if applicable);
- d) explain why a reconsideration is being requested (if applicable);
- e) attach copies of any written communication between the student and the staff member that took place at Stage 1 (if applicable); and
- f) attach evidence that supports his or her grounds for complaint, where available (which may include new evidence).

The Director who will investigate (or oversee the investigation of) the case presented with procedural fairness may:

- a) designate any staff member, at the same organisational level or lower who has not had prior involvement in the case, to assist with the investigation;
- b) consult with relevant academic and administrative staff at the same organisational level or lower, as well as students of the College, on matters pertaining to the case; and/or
- c) request the student to meet with them in person or via teleconference to discuss the case. The staff member will respond to the student in writing within 28 days of receipt of the student's written complaint.

If the student is satisfied with the response at this stage, no further action is required. If the student is dissatisfied with the response, or the decision outcome or the time taken to resolve the matter, they have the option to seeking outside counsel and engaging a third party to further the matter.

WORKPLACE HEALTH & SAFETY POLICY

Third Age Fitness has the primary duty under the WHS Act to ensure, so far as is reasonably practicable, that the training personnel, employees, other persons and students are not exposed to health and safety risks arising from the business.

As a training institute, we are obligated to do the following in, in relation to work environment/s and facilities:

- ensure, so far as is reasonably practicable, that the lighting, ventilation, and layout of the workspace enables training personnel, employees, and other persons carry out work without risks to health and safety
- ensure, so far as is reasonably practicable, the provision of adequate facilities for training personnel, employees, other persons and students including toilets, drinking water, washing and eating facilities
- manage risks associated with remote and isolated work
- prepare emergency plans

Third Age Fitness' officers, such as company directors and managers, have a duty to exercise due diligence in ensuring that we comply with the WHS Act and Regulations. This includes taking reasonable steps to ensure that Third Age Fitness has and uses appropriate resources and processes to provide and maintain a safe work environment and adequate facilities for workers.

Training personnel, employees, other persons and students have a duty to take reasonable care for their own health and safety and that they do not adversely affect the health and safety of other persons. Training personnel, employees, other persons and students must comply with any reasonable instruction and cooperate with any reasonable policy or procedure relating to health and safety at the workplace.

Third Age Fitness constantly consults, so far as is reasonably practicable, with personnel and employees who are or likely to be directly affected by a work health and safety matter. We also consult, co-operate and co-ordinate activities with all other persons who have a work health or safety duty in relation to the same matter.

QUALITY ASSURANCE POLICY

Third Age Fitness takes a systematic approach to assuring quality in all aspects of its operation. Our Quality Assurance Policy reinforces our commitment to continued improvement.

The following are in place to maintain quality within Third Age Fitness:

1. Compliance

1.1 Third Age Fitness regularly conducts internal audits. Valid, current, sufficient and authentic evidence are collected and reviewed. Findings based from this evidence will confirm whether the outcomes, which are the results of actions implemented by Third Age Fitness, achieved quality training, assessment, client services and effective management or whether there are non-compliance and gaps recorded.

Conclusions and recommendations derived from the internal audit are utilized by Third Age Fitness to plan ongoing improvements to its policies, procedures, products and services in order to address any non-compliance or opportunities to fill in gaps to generate better outcomes for clients, participants and students, and to meet changing needs.

1.2 All staff members must ensure that all data are recorded and documented following standardised templates for streamlined analysis and storage. This includes client and student information, assessment documents, and other documentation relevant to the training and assessment activities of the organisation.

2. Continuous Improvement

Third Age Fitness conducts regular self-evaluation activities for each department. The information and data collected from these sessions will be used to improve practice along with feedback from other stakeholders including clients and partner organisations. Reports from these activities will help us determine any areas for improvement, future targets, and if organisational policies and procedures are still applicable to practice.

Self-evaluation activities will be conducted through a mix of methods, including: surveys, quarterly employee reviews, yearly company-wide planning and evaluation activities.

PRIVACY AND CONFIDENTIALITY POLICY

Third Age Fitness abides by the **Privacy Act 1988** (Privacy Act) in handling the personal information of our students. thinkific only collects information that is necessary for the student's training and compliance requirements. We take all reasonable steps to protect personal information and maintain confidentiality of records and files.

The information collected and held will depend upon the products and services requested and may include but are certainly not limited to the candidate's:

- Full name
- Date of birth
- Address
- Contact details
- Age
- Sex
- Cultural background
- Disability
- Schooling

Third Age Fitness uses the information collected for the purpose disclosed at the time of collection or otherwise as set out in this Privacy Policy. Reasonable steps are also taken to ensure that information we hold, use and where appropriate, disclose to others, about the students are correct and current. The accuracy of the information depends largely upon students providing us with updated details such as:

- Current residential and/or work address
- Contact numbers (telephone and/or mobile phone)
- Email address (personal and/or work email address)

Third Age Fitness will not use personal information for any other purpose without first seeking consent, unless authorized or required by law. Generally, Third Age Fitness will only use and disclose personal information to:

- Establish and maintain the relationship with Third Age Fitness
- Provide the products and services requested from Third Age Fitness
- Administer and manage those products and services

Third Age Fitness will not disclose any information that we gather about our students to any third party. We use the information collected only for the services we provide. No student information is shared with another organization. If a student wishes information to be shared with a third party, we will require a written and verbal consent from the student prior to the release of any information.

TERMS OF USE POLICY

ONLINE MEMBERSHIPS

Membership payments

Members shall pay for all subscription fees, and hereby authorizes Third Age Fitness (and its payment processors) to debit Member's bank account or charge Member's credit card, as stated on Member's channel subscription and billing page.

All subscriptions, both month-to-month and annual plans, are recurring and will automatically renew after the end of each paid subscription period.

Membership refunds

Third Age Fitness does not offer prorated refunds for cancelled subscriptions. All subscriptions are recurring and will automatically renew after the end of each paid subscription period. This includes both month-to-month and annual plans.

You have the opportunity to test the features, limitations, and system requirements of our online memberships through our 21 Day Free Trial, before selecting any paid plan. Third Age Fitness *will therefore not issue refunds to customers* on the basis of customers not understanding the system requirements, or the presence of compatibility issues, including inadequate internet speed or consistency, or incompatible devices, operating systems, or browser software versions. System incompatibility based on system requirements should be tested during the free trial.

There will be no refunds or credits for partial months of service, upgrade/downgrade refunds, or refunds for months unused with an open account. In order to treat everyone equally, no exceptions will be made.

Membership cancellations

Members acknowledge that all subscription fees are charged automatically on a recurring basis until the Member cancels their channel subscription (both month-to-month and annual plans). To cancel your membership, email trudi@thirdagefitness.com.au.

Membership transfers

Membership is non-transferable. In order to treat everyone equally, no exceptions will be made.

Membership Annual Subscriptions

Third Age Fitness offers an Annual Subscription Plan at a significant discount. We recommend this plan for customers who are certain that Third Age Fitness is compatible with their situation. *It is your*

responsibility to evaluate Third Age Fitness membership, including its features, limitations, and system requirements before selecting the Annual Plan.

Third Age Fitness *will not issue refunds to Annual Plan customers* on the basis of customers not understanding the system requirements, or the presence of compatibility issues, including inadequate internet speed or consistency, or incompatible devices, operating systems, or browser software versions. We will endeavour to ensure you have a positive experience and get the most out of your membership though.

If you choose the Annual Plan, you are entering into a one-year subscription contract that expires 12 months after you sign up. You are responsible for paying for the entire subscription upfront. If you decide to cancel before the term of your subscription is up, then you will still be billed for the remaining months on your subscription, and will still have access to its benefits until it expires.

ONLINE TRAINING

Enrolment

Unless otherwise stated, course enrolment is for a period of 12 months (365 days), during which users can access course materials. After this time users will have access only to the course certificate via the Student Dashboard. The enrolment period begins from the date when access to course materials is granted.

If a user is unable to complete their course within the 12 month period, they may apply for an extension in writing to training@thirdagefitness.com.au. In extenuating circumstances an extension may be granted at the discretion of Third Age Fitness. Users accept that they are required to pay the full course fee even if they are unable to complete the course within the allotted time.

Certificates will not be issued if there are any unpaid enrolment fees.

Refunds & Transfers

Course fees are required to be paid at the time of enrolment, or prior to the commencement of a course (whichever is earliest).

Once a course has commenced, no refunds are available. However, in extenuating circumstances, users may request to transfer their registration to another user or another course, or a credit note may be offered for future courses. Transfers will be granted at the discretion of Third Age Fitness.

Course materials

Course material includes all web content, handouts, videos, multimedia presentations and other learning materials provided within the online training environment. All course content is available for viewing online and may not be downloaded, copied, recorded, printed or reproduced, unless specifically stated and authorised.

All course handouts and downloads remain protected by copyright and may not be reproduced or duplicated without written permission from Third Age Fitness.

The online learning portal may be unavailable to users during scheduled maintenance. During this time, if handouts or course materials are required they may be requested via email to training@thirdagefitness.com.au.

COUPON CODES

Terms of Use

Coupon codes are not redeemable for cash, and are not valid with any other offer, gift voucher, or coupon code. Coupon codes are valid for one use only per person and must be entered and redeemed at the time of course enrolment - a refund will not be issued for unused coupon codes. Coupon codes must be used within the time frame specified, otherwise they will be forfeited.

WORKSHOP TRAINING

Event cancellation by Third Age Fitness

Sometimes Third Age Fitness has to cancel a workshop due to unforeseen circumstances. In this event, registrants will be offered a full refund of their workshop registration fee. If the event is postponed, registrants will have the option to receive a refund or to transfer registration to the next workshop date.

Registration cancellations by registrant

Third Age Fitness will not offer refunds for registrants who change their mind or are no longer able to attend the workshop. Cancellations received more than 10 days before the workshop are able to receive a workshop credit or transfer, to be used within 12 months. A credit is not available to registrants who do not turn up on the day, however in extenuating circumstances exceptions may be made. All cancellation and transfer requests must be made in writing via email to training@thirdagefitness.com.au.

COPYRIGHT & PRIVACY

Third Age Fitness adheres with the Copyright Act for the use of copyrighted content (texts, images, audio and video materials).

For materials from the Internet, Third Age Fitness always sees to it that permissions are reviewed before using such content. If implied permission to use the content of a website is not clearly provided, we always send an email request for permission to use the content from copyright owner(s).

If the material from the internet has a copyright that has expired or the copyright owner gives very broad permissions to use the material freely, and is part of the 'public domain', Third Age Fitness observes proper attribution practice in crediting a copyright owner's work, as well as proper citation for referencing sources like published books, articles, government documents, primary resources, etc. used in writing our learning resources.