



**MASTER LOCKSMITHS ASSOCIATION
OF AUSTRALASIA LIMITED**

CODE OF CONDUCT

INTRODUCTION

This Code provides a set of rules designed to ensure that members contribute effectively to the security of the community and the professionalism of the locksmithing industry.

Non-compliance renders members liable for disciplinary action that may result in expulsion.

PROFESSIONAL ADVICE AND SERVICE

- Members must maintain professional levels of knowledge and skill
- Advice to clients must provide outcomes that most effectively meet the client's requirements
- Services provided to clients must reflect the professional locksmithing standards required by the Association
- Members must act with integrity and in a courteous and dignified manner
- The use of improper methods of soliciting business is unacceptable and members must decline to accept any business that is incompatible with Association rules or is unlawful
- Members must refrain from close association with or allowing their name to be used by any person or business of questionable character
- Members must not act or refrain from acting in a manner that results or is likely to result in the Association or locksmithing industry being brought into disrepute.

COMPLIANCE WITH LEGISLATION AND RULES

- Members are required to ensure that they and their employees and sub-contractors comply with each and every law of all levels of government and Code of Practice relevant to their business
- Members are required to ensure that they and their employees and sub-contractors comply with the Associations Memorandum and Articles of Association and rules and policies as adopted by the Board from time to time.

CONFIDENTIALITY AND SECURITY

- Specialist locksmithing knowledge and skills must be kept in strict confidence except when passing such knowledge and skills onto other professional locksmiths or training organisations, approved by the Association, for the betterment of the industry
- Records relating to clients security systems, key systems and other matters that the client would regard as being confidential must be retained in such a manner that it cannot be accessed by unauthorised employees or other persons
- Tools, technical manuals or any other document or thing that could pose a threat to the security of the community must be retained in a secure area.

HEALTH AND SAFETY

- Members are required to provide each employee and officer with a safe and healthy work environment.
- Each member has the responsibility for maintaining a safe and healthy workplace for all employees by following environmental, safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.
- Violence and threatening behaviour towards employees and the public is not permitted.
- Members and their employees are expected to perform their related work in a safe manner, free of the influences of alcohol, illegal drugs or controlled substances. The use of illegal drugs in the workplace will not be tolerated by the Association.

MEMBER EXPECTATIONS

- Members are required to support their employees in the delivery of services on behalf of the company.
- Members must ensure the minimum standards of the applicable State and Federal Awards are being applied in relation to pay entitlements.
- Members must ensure their business does not engage in or associate with another firm which engages in unethical, improper or illegal methods to obtain business, including conflicts of interest.
- Members must ensure they engage in industry best practice in the delivery of its services and actively participates in industry related training, testing and exhibitions designed to raise the standard of service delivery.

RECORD KEEPING, FINANCIAL CONTROLS & DISCLOSURES

- Members are required to keep honest, accurate and timely recording and reporting of information in order to make responsible business decisions.
- Members must ensure all Company books, records, accounts and financial statements are:
 - (a). maintained in reasonable detail, appropriately reflect the Company's transactions
 - (b). promptly disclosed in accordance with any applicable laws or regulations
 - (c). conform to allow regulatory bodies and relevant industry associations to determine level of compliance
 - (d). conform both to applicable legal requirements and to the Company's system of internal controls

STORAGE OF MLAA AND OTHER RESTRICTED KEY BLANKS, PLUGS, CYLINDERS AND/OR OTHER PRODUCTS

- MLAA and other restricted key blanks must be retained in a safe or secure container separate from plugs, cylinders and other products and under independent lock and key
- Plugs, cylinders and other products for MLAA and other restricted systems must be retained under the maximum possible degree of security
- Supplies of key blanks, plugs, cylinders and/or other products for MLAA and other restricted systems must only be ordered for the purpose of fulfilling firm orders from clients or maintaining minimum quantities of stocks reasonably required for the efficient and effective conduct of business
- Compliance with all relevant provisions contained in contracts with the MLAA and/or other supplier and/or manufacturer is mandatory.

ISSUE OF MLAA AND OTHER RESTRICTED KEYS, PLUGS, CYLINDERS AND/OR OTHER PRODUCTS

- Records detailing the number and type of MLAA and other restricted key blanks received, issued or otherwise disposed of must be retained
- Records detailing the client's name and address, location of each system, number of keys supplied and their coding and stamping, date upon which each and every key is supplied and to whom it is supplied, a written signature authority naming the persons authorised to obtain keys and containing specimen signatures of such persons together with the clients signed letters of authority for the issue of keys, plugs, cylinders and/or other products must be maintained.
- In order to protect the security of the community members may only cut keys to and provide plugs, cylinders and/or other products for restricted systems that they control, have the necessary record for and where the signature on the order form matches the signature authority record or where the order is received by the transfer of authenticated electronic order data using key management software that meets the following minimum security requirements:
 - (a). each signatory must enter a private password to provide the signatory's authentication to the order; and
 - (b). the order must not be capable of being altered after being authenticated; and
 - (c). the authenticated order must be transferred to the locksmith in a form that is not plain-text and that incorporates tamper protection; and
 - (d). the system validates that an appropriate combination of signatories have authenticated the order for the selection of keys that have been ordered
 - (e). unless they have the specific detailed written authority of the originating locksmith who must first be provided with all necessary information to enable that locksmith to ensure that the order is bona fide.

- When a member is approached to take control of another member's MLAA system, the Association's Transfer of Systems policy is to be implemented
- When a member receives a request to perform "emergency" work on a cylinder that is part of another member's system and the originating member cannot be contacted, the cylinder can be removed and replaced with a temporary cylinder. The originating member must be advised at the earliest opportunity but no later than the first business day thereafter
- In order to further protect the security of the community existing master key systems cannot be expanded by other than the originating locksmith unless the system is transferred in accordance with the policies of the MLAA and/or supplier. If such a transfer cannot be implemented the entire system must be rekeyed
- All restricted keys must be stamped with the system code, if a master key the type of master key and, unless requested to the contrary by the client, be serially numbered
- Restricted key blanks are not to be sold or otherwise transferred
- Compliance with all relevant provisions contained in contracts with the MLAA and/or other suppliers and/or manufacturers is mandatory.

GAINING ENTRY TO PREMISES OR VEHICLES

- A completed MLAA lockout authorisation form or equivalent must be completed and signed by the client before entry is attempted. Such forms are to be retained for a minimum of five years.
- Evidence confirming the client's right to entry must be sighted and noted on the authorisation form or equivalent before entry is attempted.
- Evidence, preferably photographic, confirming the client's identity must be sighted and noted on the authorisation form or equivalent before entry is attempted.
- If the member is uncertain as to the authority to enter and/or the identification of the client the client is to be advised that he or she should contact the police to obtain verification of the right to enter. If the client refuses, entry is not to be attempted.

EVICITION AND TAKING POSSESSION

- Services involving eviction and taking possession of property in accordance with the order of a court or tribunal require the production of appropriate authority before they are commenced
- Where a Sheriff's Officer, Police Officer or Officer of the Court requests the service the court order is to be sighted and details recorded and the officer's name and identification are to be recorded
- Where the person requesting the service is other than a Sheriff's Officer, Police Officer or Officer of the Court the court order is to be sighted and details recorded and relevant identification and authority to act upon the court order are to be sighted and recorded.

BUILDING CODES

- Compliance with the provisions of the Building Codes of Australia and other legislation or codes relevant to their business (in particular those relating to the fire and escape doors) is mandatory
- Where a member becomes aware of any contravention of the Building Codes of Australia and/or other relevant legislation or codes, the client is to be advised accordingly.

SAFE AND VAULT OPENING AND SERVICING

- Unless circumstances necessitate otherwise, the Member is only to unlock the mechanism leaving the opening of the door and removal of any contents to the client. If necessary, further work may then be performed
- Any remedial work that may reduce the level of security previously provided must not be performed unless the client is made fully aware of the circumstances and agrees to such work
- Suitable steps, including where necessary screening, are to be taken to ensure that unauthorised persons do not witness the opening, servicing or any other work.

CODE OF CONDUCT BREACH

- Where a breach of the Code of Conduct is brought to the attention of the Association, the Association will raise this with the firm in writing and provide it with the opportunity to remedy the breach in the first instance before taking appropriate disciplinary action.
- The Association will ensure they proactively raise breaches of the code of conduct with their industry association where they come to the attention of the firm.
- The Association's 'Complaint Management Policy' is to be followed in the event of a written complaint being submitted by a member or customer.

COMPLAINT MANAGEMENT POLICY

1. PURPOSE

The purpose of this policy is to contribute to the MLAA's ability to continue to provide a "professional guarantee" for services provided by members.

2. APPLICATION

The policy applies whenever a complaint concerning any aspect of the service provided by members is received.

3. RECEIPT OF COMPLAINT

- (a). All complaints are to be referred to Head Office
- (b). Head Office will request that the complainant forward written details of all the relevant circumstances
- (c). Unless exceptional circumstances are evident only written complaints will be the subject of investigation.
- (d). Head Office will acknowledge receipt of a written complaint within two working days with a written letter and sent via registered post.

4. INVESTIGATION/RESOLUTION OF A COMPLAINT AGAINST A MEMBER

- (a). All complaints are initially reviewed by the Chief Executive Officer or in his or her absence the relevant Branch Director.
- (b). The Chief Executive Officer will discuss the complaint with the relevant Branch Director to determine whether either one of them will investigate and attempt to resolve the complaint or whether the matter will be referred to the Branch Complaints Committee for its dealing (see 4(e) below)
- (c). The Chief Executive Officer or the relevant Branch Director will discuss the complaint with the member concerned to establish the facts from the member's perspective and, if appropriate, attempt to resolve the matter.
- (d). If the Chief Executive Officer or Branch Director are unable to resolve the matter it will be forwarded to the Branch Complaints Committee.
- (e). The Branch Complaints Committee comprises the Branch President and two members of the Branch Executive appointed annually by the Branch President.
- (f). The meeting(s) of the Committee will be held at a time and place determined by the Branch President with consideration being given to the reasonable requirements of the member who is the subject of the complaint.
- (g). The Committee (or one or more of its members) may inspect the work that is the subject of the complaint and discuss the matter with the complainant and the member either before or after its initial meeting.
- (h). The member who is the subject of the complaint must be given adequate opportunity to provide the meeting(s) with a verbal and/or written response to the complaint and any findings of fact by the Committee arising from the inspections referred to in 4(g) above.

- (i). Within two working days of the Committee's meeting(s) the Branch President will forward minutes of the meeting(s) and the Committee's recommendation to the Chief Executive Officer and Branch Director for consideration.
- (j). The Chief Executive Officer and/or the Branch Director will give consideration to the Committee's minutes and recommendation and attempt to resolve any remaining dispute between the complainant and the member concerned.
- (k). If the Chief Executive Officer and/or the Branch Director are unable to resolve the matter they are to forward a report, including the Committee's minutes and recommendation, to the Directors of the Association, for consideration and determination of action to be taken.
- (l). The Chief Executive Officer will notify in writing the complainant, member concerned and the Branch President of the Board's decision.
- (m). If the Board determines that disciplinary action is necessary the policy in respect of such action is to be followed.

5. INVESTIGATION/RESOLUTION OF A COMPLAINT AGAINST AN OFFICER OR EXECUTIVE

- (a). Complaints against a member of a Branch Executive are to be investigated and determined by the Chief Executive Officer and a Complaints Committee consisting of two Directors.
- (b). Complaints against the National or a Branch President or a Director are to be investigated and determined by the Chief Executive Officer and a Complaints Committee consisting of three Directors.
- (c). Complaints against the Chief Executive Officer are to be investigated and determined by the Board of Directors.
- (d). The officer/executive who is the subject of a complaint must be afforded natural justice and if disciplinary action is to be taken the policy in respect of such action is to be followed.

6. RIGHTS OF APPEAL

- (a). The Member may within 7 days in writing lodge an appeal against the Directors decision.
- (b). Any such appeal will be heard within 5 days by a Committee of three Life Members as formed by the Chief Executive Officer of the Association.
- (c). The findings of the Appeal Committee will be minuted and deemed to be final.

7. REPORTING OF COMPLAINTS

- (a). Copies of complaints and accompanying paperwork will be kept on file at the National Office.
- (b). A spreadsheet will be maintained and updated when a written complaint is presented to the National Office. Details including description, person or branch responsible, timeline and outcomes will be noted.
- (c). The MLAA Annual Report will specify and summarise the number of complaints, description and nature of each complaint and the action taken for each complaint.



MASTER LOCKSMITHS ASSOCIATION OF AUSTRALASIA LIMITED

MASTERLOCKSMITHS.COM.AU

Master Locksmiths Association of Australasia
4a/34 Carrick Drive
Tullamarine, Vic 3043

Phone: (03) 9338 8822 Fax: (03) 9338 6299
national@masterlocksmiths.com.au

ABN: 26 008 578 603