



# CODE OF CONDUCT POLICY

## April 2023

## Contents

1. INTRODUCTION .....	3
2. POLICY STATEMENT.....	3
3. LEGAL FRAMEWORK.....	3
4. SCOPE AND OBJECTIVES .....	3
5. STRUCTURE OF THE CODE.....	4
6. ACTING IN THE BEST INTERESTS OF THE HOUSING ASSOCIATION AND ITS RESIDENTS.....	4
7. REPRESENTING THE HOUSING ASSOCIATION.....	5
8. BEHAVING WITH INTEGRITY.....	6
10. FUNDS, RESOURCES AND PERSONAL BENEFIT.....	8
19. RELATED INTERNAL POLICIES .....	15
20. CONSULTATION .....	15
21. REVIEW AND APPROVAL.....	15

## **1. INTRODUCTION**

1.1 This document sets out the Code of Conduct for St George Housing (SGH) Association staff and Board Members. It covers all categories of Board Members, including co-optees, and any Committees that the Board may establish from time to time.

## **2. POLICY STATEMENT**

2.1 As a Social Landlord using large amounts of public funds, SGH recognises the need to set and achieve high standards of conduct for its staff and Board Members.

2.2 SGH is committed to achieving high standards of probity and has chosen to adopt the National Housing Federation Code of Conduct 2022 as the framework for which our principles will be based.

## **3. LEGAL FRAMEWORK**

3.1 The legal framework that underpins this policy includes:

- The Housing Regeneration Act
- Bribery Act 2010
- Governance and Financial Viability Standard
- The Housing regeneration Act 2008
- The Data Protection Act 2018
- The Fraud Act 2006

3.2 This policy complies with Regulator of Social Housing (RSH) Standards, in particular the Governance and Financial Viability Standard.

## **4. SCOPE AND OBJECTIVES**

4.1 This policy applies to all staff and Board members, including co-optees, Committee members and volunteers.

4.2 The objective of this policy is to provide clear guidance on the minimum standards of conduct expected from staff and Board members.

## 5. STRUCTURE OF THE CODE

5.1 The Code is split into four main parts, each embodying a key theme arising from the mission and values of housing associations. The four parts of the Code are:

- Acting in the best interests of the housing association and its residents;
- Behaving with integrity;
- Conducting yourself professionally and treating others well;
- Protecting yourself, others and the environment:

5.2 In all of your activities as Board members of SGH, you are expected to uphold and be seen to uphold the principles above and demonstrate commitment to them.

## 6. ACTING IN THE BEST INTERESTS OF THE HOUSING ASSOCIATION AND ITS RESIDENTS

6.1 You have a responsibility to discharge your role in line with the purposes and values of the housing association.

### **The Principle**

You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of the housing association and for the delivery of its strategic objectives.

### **EXPECTED BY ALL**

6.2 A1: You must always try to fulfil the requirements of your role to the best of your ability. If any circumstances arise that limit your ability to meet your responsibilities, you must raise this through the appropriate channels.

6.3 A2: In carrying out your role, you must always seek to further the housing association's strategic objectives, reflecting the housing association's desired culture.

- 6.4 A3: You must not act in a way that discriminates against, or unjustifiably favours, particular individuals, groups or interests, including on the basis of any protected characteristics they may have.
- 6.5 A4: You must consider the impact of your actions on the safety and wellbeing of residents.

#### **EXPECTED BY BOARD MEMBERS**

- 6.6 A5: You must respect the principle of collective decision-making and corporate responsibility.
- 6.7 A6: You must ensure that you declare to the housing association any relevant personal relationships, employment and other appointments you hold, and that these do not interfere with your ability to perform or conflict with your role as a board member.

#### **EXPECTED BY STAFF**

- 6.8 A7: You must consult your manager before taking any other paid or voluntary work that may interfere with your existing job, or conflict with terms set out in your contract of employment.

### **7. REPRESENTING THE HOUSING ASSOCIATION**

#### **The Principle**

representing the housing association in any capacity, including at external events, in dealings with outside bodies and on social media, you are an ambassador for the housing association and must uphold and promote its values, objectives and policies.

#### **Expected of all**

- 7.1 B1: In representing the housing association, you must act in accordance with its values, policies and goals.
- 7.2 B2: You must not conduct yourself in a manner that could reasonably be regarded as bringing the housing association into disrepute.

- 7.3 B3: You must not make derogatory, false or otherwise damaging comments, in person or through any medium, about the housing association or any person, service or organisation connected with it.
- 7.4 B4: You must not seek to officially represent the views or position of the housing association without prior authority.
- 7.5 B5: You must adhere to the housing association's policies in the use of email, intranet and internet services including social media.
- 7.6 B6: When representing the housing association through any medium, including social media, you must at all times act with professionalism.
- 7.7 B7: Where any personal social media accounts refer to your role with the housing association, you must make it clear in what capacity you are communicating.
- 7.8 B8: If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect the housing association, you must obtain prior consent. Such consent must not be unreasonably withheld unless your activity poses a material risk to the association.

### **EXPECTED OF BOARD MEMBERS**

- 7.9 Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or long-standing, and in the opinion of the board cannot be managed appropriately.

### **8. BEHAVING WITH INTEGRITY**

- 8.1 The reputation and good name of the housing association depends on compliance with this Code, and with the laws, policies and procedures that it refers to. The integrity of those involved needs to be beyond doubt, and seen so to be.

## CONFLICTS OF INTEREST

### **The principle**

You must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between your duties to the association and your personal interests, other duties and relationships.

### **EXPECTED FROM ALL**

- 8.2 C1: You must formally declare to the housing association, at the earliest opportunity, any interests which may, or may be perceived to or may in the future, conflict with the duties of your role.
- 8.3 C2: You must declare any known relationship to a person applying for or performing a role within the housing association and must not be involved in their appointment, performance management or reward.
- 8.4 C3: You must declare any known relationship to a resident, potential resident or other customer of the association. You must not be involved in decisions relating to their relationship with the housing association or seek or accept preferential treatment for them.
- 8.5 C4: You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to the association and must not be involved in their appointment, performance management or reward.
- 8.6 C5: Except where specifically permitted, as set out in the housing association's relevant policy, you must avoid using its contractors and suppliers for private purposes.
- 8.7 C6: You must not use, or attempt to use, your position to promote personal interests or those of any connected person, business or other organisation for personal gain.

## EXPECTED OF BOARD MEMBERS

- 8.8 C7: Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or long-standing, and in the opinion of the board cannot be managed appropriately.

## 9. BRIBERY, GIFTS AND HOSPITALITY

### **The principle**

In your role with the housing association, you must not offer, seek or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisations. You must not seek or accept preferential treatment in the provision of benefits such as housing accommodation or employment.

### EXPECTED BY ALL

- 9.1 D1: You must not solicit or seek gifts or hospitality or other benefits.
- 9.2 D2: Any gifts or hospitality offered to or by you must be either declared or declined according to your housing association's policies.
- 9.3 D3: If you are offered a bribe, hospitality or a gift, which is or may be in return for expected preferential treatment, you must decline and declare this immediately to the appropriate person.

## 10. FUNDS, RESOURCES AND PERSONAL BENEFIT

### **The principle**

You must not misuse the housing association's funds or resources or seek preferential treatment for your own personal benefit.

### EXPECTED BY ALL

- 10.1 E1: You must ensure that the housing association's funds and resources are used properly and efficiently.



- 10.2 E2: Your procurement decisions must be guided by the housing association's policies and fairness in decision-making and in line with relevant law.
- 10.3 E3: You must take all reasonable measures to protect the housing association's funds, resources, property and assets from fraud, theft, damage and misuse.
- 10.4 E4: If you claim reimbursement for any expenses you must do so in line with the housing association's policies and procedures.

## 11. CONFIDENTIALITY

### **The principle**

You must process information in accordance with the law and the housing association's policies and procedures.

### **EXPECTED BY ALL**

- 11.1 F1: You must not disclose, without the required permission and authority, any personal data about tenants, customers, staff or colleagues.
- 11.2 F2: You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left the housing association or stepped down from your position.
- 11.3 F3: You must not, without authority, pass or distribute to the press or media or any other external recipient(s) any unpublished information or materials relating to the association, unless you are doing so in accordance with the housing association's whistleblowing policy and procedure.
- 11.4 F4: You must not prevent another person from gaining access to information to which they are entitled to by law.

## 12. REPORTING CONCERNS

### The principle

You must report to the appropriate person within the association any reasonable suspicions you have about possible wrongdoing in line with your association's relevant policies and procedures.

- 12.1 G1: If you have a concern about possible wrongdoing, you must immediately report it via the appropriate internal channel or external body. This includes becoming aware of potentially dishonest or fraudulent activity, and material breaches of this Code or relevant legislation including health and safety.
- 12.2 G2: If you believe that you are being required to act in a way which conflicts with this Code or legislation, you must immediately report it via the appropriate channel.
- 12.3 You must not victimise or disadvantage any person who uses or intends to use the housing association's confidential reporting (whistleblowing) procedures to report actual or alleged wrongdoing.

## 13. CONDUCTING YOURSELF PROFESSIONALLY AND TREATING OTHERS WELL

- 13.1 Professionalism, consideration and respect for others, and a commitment to the principles of equality, diversity and inclusion, are fundamental to the delivery of social purpose.

### RESPECT FOR OTHERS

#### The principle

You must treat all others with respect and consideration.

- 13.2 H1: You must treat everyone you meet in the performance of your role with equal respect, care and consideration.
- 13.3 H2: You must show respect for individuals' chosen identities.

- 13.4 H3: You must promote, through your own behaviours, an organisational culture that is welcoming, accepting and accommodating to people of all backgrounds, cultures and personal and protected characteristics.
- 13.5 H4: You must not harass, bully or attempt to intimidate any person, or use threatening or aggressive behaviour or other discriminatory behaviours. You must seek to avoid microaggressions in your speech and behaviour.
- 13.6 H5: You must not display materials in your workplace or use language in the performance of your role which other people might reasonably find offensive.
- 13.7 H6: You must report through appropriate channels any instances of unfair or unequal treatment in the workplace and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and respecting confidentiality.

## 14. WORKING WITH RESIDENTS AND OTHER CUSTOMERS

### **The principle**

You must be professional, fair and courteous in all your dealings with residents and other customers.

### **EXPECTED BY ALL**

- 14.1 I1: You must seek and value views from residents and other customers when making decisions that will affect them.
- 14.2 I2: You must not allow any personal relationship with a resident or other customer to influence how you discharge your role and responsibilities.
- 14.3 I3: You must not give personal gifts or loans of money to, or receive personal loans or gifts of money from, residents or other customers.

- 14.4 I4: You must handle residents' and other customers' money only where absolutely necessary and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with the association's financial policies, procedures and controls to ensure appropriate handling of any and all funds.
- 14.5 I5: You must not invite or influence a resident or other customer unless they are a person who you are closely connected to, to make a will or trust under which you are named as executor, trustee or beneficiary.

## 15. PROFESSIONAL RELATIONSHIPS

### **The principle**

Board members, staff and involved residents must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.

### **EXPECTED BY ALL**

- 15.1 J1: You must not ask or encourage the commitment of wrongdoing, including any breach of this Code.

### **EXPECTED BY BOARD MEMBERS**

- 15.2 J2: Your relationships with staff and involved tenants must be constructive and professional.
- 15.3 J3: You must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies and objectives of the housing association.

### **EXPECTED BY BOARD MEMBERS AND INVOLVED RESIDENTS**

- 15.4 J4: Where it is necessary to raise issues of staff, board or contractor performance, these must be raised constructively and through the appropriate channels.
- 15.5 J5: You must not undermine or appear to undermine the authority of a senior officer in his or her dealings with a more junior member of staff.

- 15.6 J6: You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with members of staff.
- 15.7 J7: Unless you have specific and, where practicable, written delegated authority to do so, you must not individually give instruction or direction to any member of staff or contractor.

#### **EXPECTED BY STAFF**

- 15.8 J8: You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding, in a professional setting, inappropriate personal familiarity with board members and involved residents.
- 15.9 J9: You must not use informal channels to lobby or influence board members or involved residents on matters of the housing association's business.
- 15.10 J10: You must not knowingly mislead the board or any of the housing association's committees or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.

## **16. LEARNING AND DEVELOPMENT**

### **The principle**

In partnership with the housing association, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

#### **EXPECTED OF ALL**

- 16.1 K1: You must play an active part in the housing association's supervision and performance appraisal processes as applying to you.
- 16.2 K2: You must offer open and constructive feedback to others and invite feedback about your own performance.
- 16.3 K3: You must make your personal training and development needs relevant to your role known to the association.

## **EXPECTED OF BOARD MEMBERS**

- 16.4 K4: Unless there are exceptional reasons, you must attend learning and development events as required.
- 16.5 K5: You must keep your knowledge up to date in those areas in which you are a specialist, as well as keeping abreast of any matters relating to your association and the wider housing sector.

## **17. PROTECTING YOURSELF, OTHER PEOPLE AND THE ENVIRONMENT**

- 17.1 You have a responsibility while on the housing association's business to protect your own health, safety, security and wellbeing and that of others, and to minimise harmful environmental impacts.

### **HEALTH, SAFETY AND SECURITY**

#### **The principle**

Your conduct, actions and decision making must promote the health, safety, security and wellbeing of yourself or others.

### **EXPECTED OF ALL**

- 17.2 L1: You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk.
- 17.3 L2: If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or a group of individuals connected with the association, you must report this immediately through the appropriate channels.

## **18. PROTECTING THE ENVIRONMENT**

#### **The principle**

Within your role at the association, you must strive to avoid or reduce possible negative environmental impacts.

### **EXPECTED BY ALL**

- 18.1 In carrying out actions or making decisions in the performance of your role, you must consider the environmental impact of your decisions and where you are able, seek to achieve positive environmental outcomes.

## EXPECTED OF BOARD MEMBERS

- 18.2 You should consider the long-term environmental impact of your decisions

## 19. RELATED INTERNAL POLICIES

- Conflict of interest policy
- Whistle blowing policy
- Gifts and hospitality policy
- Bribery and anti-bribery policy
- Board Terms of Reference
- SLT Terms of Reference
- Scheme of Delegations
- GDPR Policy
- Board member induction pack

## 20. CONSULTATION

- 20.1 This policy will be reviewed in consultation with the Board.

## 21. REVIEW AND APPROVAL

- 21.1 This policy will be reviewed at least every 2 years or as required to take into account changes in legislation.

**Responsible officer:** Company Secretary

**Policy Author:** Director of Governance

**Policy version:** V1

**Date of Board Approval:** April 2023

**Date the next review is due:** April 2025