

Name of policy	Code of Conduct
Policy Owner	Head of People
Agreed date of implementation	February 2020
Date of review	September 2021

CODE OF CONDUCT - SUMMARY OF GENERAL PRINCIPLES

Please note that this section is not a substitute for reading the whole policy it only provides a summary of the main points.

1. **General Responsibilities:** You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of the association and its customers.
2. **Conflicts of Interest:** You must take all reasonable steps to ensure that no undeclared conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise, including your outside activities.
3. **Bribery, Gifts and Hospitality:** You may not benefit financially from relationships with customers, contractors or suppliers. 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. Gifts or hospitality of a value exceeding £25 must be declared and in the case of gifts from vulnerable service users the maximum value is £5 .
4. **Funds and Resources:** You must not misuse the associations funds or resources.
5. **Confidentiality:** You must handle information concerning customers in accordance with the law and the association's policies and procedures.
6. **Respect for Others:** You must treat others with respect at all times. NCHA will not tolerate racist, sexist, homophobic or other discriminatory behaviour from staff, Board Members, customers, or their relations, customers and all other stakeholders.
7. **Relationship between Board Members and Employees:** Board Members and employees must maintain a constructive, professional relationship based on a sound understanding of their respective roles.
8. **Relationship with residents and other service users:** You must maintain high standards of professionalism, fairness and courtesy in all your dealings with customers and their relations.
9. **Health, Safety and Security:** Your conduct must not endanger the health, safety or security of yourself or others.
10. **Conduct at meetings:** Your conduct at Board and other meetings must meet a high standard of integrity, commitment and courtesy.
11. **Representing the association:** In representing the association at external events and in dealings with outside bodies, you must uphold and promote the associations values, objectives and policies. You

must declare to your line manager, any criminal convictions/cautions received during your employment or term of office with NCHA as soon as possible.

- 12. Learning and Development:** In partnership with the association, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.
- 13. Reporting concerns:** You must report any reasonable and honest suspicions you may have about possible wrongdoing by other staff, suppliers or contractors, including suspicions about suspected abuse and/or improper treatment of customers, to your line manager or the Internal Auditor.

INTRODUCTION

NCHA Code of Conduct defines the conduct required of all individuals directly involved in delivering the association's business activities. Except where otherwise indicated, the code applies equally to Board Members, staff and volunteers.

It provides guidance on how to ensure that your actions and behaviour are consistent with NCHA's and the National Housing Federation (NHF) values and the high standards of conduct required to maintain confidence in the association and its work, and to avoid any conflict of interest.

Details of the full provisions relating to Conflict of Interest may be found in sections 2.20 and 2.21 of NCHA's Financial Regulations, which are available on Igloo or the Finance Team.

In addition the Code of Conduct includes provision to ensure compliance with s122 of the Housing and Regeneration Act 2008 and the Excellence in Standards of Conduct for Members (NHF 2010) and to comply with the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

You must familiarise yourself with the contents of the Code and act in accordance with its principles and provisions at all times. Failure to comply with the Code of Conduct may be an employment or governance disciplinary matter.

If board members or involved customers have any doubts or questions regarding the application of the code, or in relation to a specific issue, they should seek advice and guidance from the company secretary. Members of staff and volunteers should seek advice and guidance from their line manager or HR if they prefer.

1. General Responsibilities

- 1.1 You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of the association, its customers, and other service users.
- 1.2 You must comply with the law, your terms of appointment and the associations policies and procedures relating to your role.
- 1.3 You should be professional, respectful, courteous, polite, reliable sober, punctual, open, honest, transparent, presentable and responsive in your dealings with colleagues, staff, customers and stakeholders.
- 1.4 You should maintain a tidy, professional appearance which complies with health and safety at work issues, is appropriate to the task being carried out, clean and in good repair, not likely to cause offence, and conveys a professional image.
- 1.5 You must not conduct yourself in a manner which could reasonably be regarded as bringing the association into disrepute. This includes membership of, or participation in, activities organised by groups or organisations which are not open to the public and has secrecy about its

rules, membership or conduct, or whose values are inconsistent with the associations (e.g. racist organisations), which could create reasonable doubt in your ability to comply with the associations values and this code.

- 1.6 You must not bring the association's name into disrepute or affect its integrity by your actions or words, either within the organisation or outside. This includes the use of, or entries on, social media sites such as Facebook, Twitter, YouTube and others. This includes making derogatory comments about the association, its customers or their relations, partners or services, either in person or in writing via any web-based media such as a personal blog or other site. This also applies if you do not name the association but where its identity can reasonably be inferred, or where you use a pseudonym but your identity can reasonably be inferred. If you have a genuine concern about possible wrongdoing, you must report it to your line manager or the Internal Auditor.
- 1.7 You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.
- 1.8 You must respect the appropriate channels for handling tenancy and service provision issues. You must not act outside the associations established procedures in any matter concerning any tenant, resident or other service user.
- 1.9 You must not misuse your position, for example, by using information acquired in the course of your duties for your private interests or those of others.
- 1.10 You must respect the principle of collective decision making and corporate responsibility. This means that once the Board has made a decision you must support that decision.
- 1.11 You must not engage in any political or campaigning activity that might compromise the position of the association. Board Members intending to stand for political office must discuss the matter with the Chair of the Board. Employees seeking political office should seek the approval of the Chief Executive. Approval will not unreasonably be withheld, unless such involvement might impact upon your working time and/or arrangements with NCHA. Your work with NCHA must take precedence and there must be no conflict of interest, for example you must not allow your own personal or political opinions to interfere with your work or impartiality.
- 1.12 Board Members – if you take up new employment or appointments during your term of office on the Board, you must make any necessary declaration of interest. Any such work or position must not interfere with your role as a Board Member.
- 1.13 Employees – you must declare any existing or future commitment for outside work, paid or unpaid, to the Head of People. from whom you must obtain written permission to undertake such activities. Any such work or position must not interfere with your existing job or conflict with the interests of your job or the association.

1.14 No outside work (paid or unpaid) should be undertaken from an NCHA workbase and no use should be made of office facilities (e.g. phones, mail etc.)

2. Conflicts of Interest

2.1 You must always act in an impartial manner, taking all reasonable steps to ensure that no undeclared conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise.

2.2 You must comply with the association's policies and procedures for declaring, recording and handling actual or potential conflicts of interest, financial or otherwise. Amongst other things, these require you to declare to your Director any private interests which may, or may be perceived to, conflict with the duties of your role as soon as they arise.

2.3 You must ensure that your entry in the association's register of interests is complete, accurate and up-to-date.

2.4 If you have a close personal relationship (e.g. relative/partner/ "significant other"- which includes "caring for", "guardian of" or "in business relationship with" with another NCHA employee, you should inform your line manager(s) or the HR Department at the earliest opportunity. This information will be treated in strict confidence. NCHA reserves the right to take action where there is any possibility that your involvement in a close personal relationship with another NCHA employee could lead to accusations of favouritism, collusion, breaches of confidentiality etc. that could have implications for service provision to customers, other stakeholders or employees. Each case will be reviewed on its individual circumstances and any action taken will be proportionate to the particular case.

2.5 Employees and their relatives may be housed if they are in housing need and fully meet the published criteria and priorities agreed by NCHA in allocating housing, both in initial lettings and any subsequent re-housing or transfer. All such applications must be approved by the Executive Team as part of the Housing of Board Members, Staff and Relatives procedure. This also applies to the provision of care or support services.

2.6 You must comply with the association's policies and procedures relating to the application for housing from members of staff, board members, customers or others to whom you are related or closely connected, and must advise your line manager if any of your relatives are applying for housing or the benefit of any other service provided by NHCA. You must have no involvement or influence over the process of allocating the property.

2.7 If you are involved in the recruitment process have a personal friendship or familial relationship or are closely connected with an applicant, you must declare this as soon as you are aware of the individual's application and seek advice from HR regarding their involvement in the recruitment and selection process. You must not be involved in decisions relating to

discipline, promotion, pay or benefits for any member of staff to whom you are related or closely connected. You must not canvas support for any candidate applying for any post.

- 2.8 You must not be involved in the appointment of a consultant, contractor or supplier where you are related, or closely connected, to an organisation or individual applying or tendering for a contract. You must declare any such current or past business or private relationship to your Director as soon as it arises. You must not be involved in establishing the terms of a contract, or its ongoing monitoring and management, where you are related, or closely connected, to the contractor or supplier.
- 2.9 Except where specifically permitted, you must avoid using the association's contractors and suppliers for private purposes. Where this is unavoidable you must ensure a complete separation between work and private transactions, and must not seek, offer or receive a favourable service as a result of your connection with the association. Prior written approval from your Director must be sought before using the supplier or contractor and a written declaration made confirming that no financial or other advantage has been secured as a result of the relationship with the association.
- 2.10 You must not use, or attempt to use, your position to promote your personal interests or those of any connected person, business or other organisation.
- 2.11 Where a conflict of interest becomes apparent during the course of any work related meeting, you should advise those present and take no further part in the discussion. If you are the sole representative of NCHA, you should move to adjourn the meeting so that your place could be taken at a future meeting by some other person.

3. Bribery, gifts and hospitality

- 3.1 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.
- 3.2 You may not benefit financially from relationships with customers, contractors or suppliers.
- 3.3 You must comply with the law and the association's policies and procedures in relation to:
 - bribery and corruption; and
 - the giving, receipt, approval and recording of gifts and hospitality.
- 3.4 You must not canvass or seek gifts or hospitality or other benefits.

- 3.5 You must not be compromised by, or take advantage of, your relationship with customers, or their relations, or other NCHA employees for personal gain.
- 3.6 If you are offered gifts or hospitality, they should either be declined, or prior approval sought for their acceptance. The only exceptions are gifts of token value or modest hospitality, of less than £25 value for a single item or £50 aggregate over a 12 month period, given in connection with normal work meetings. The maximum value of gifts or hospitality that can be received from vulnerable customers is £5. More detail on service user gifts is in the Care and Support quality manual.
- 3.7 The association's Gifts and Entertainment procedure, available on Igloo, gives further guidance.
- 3.8 All gifts and/or hospitality accepted and/or given that exceed £25 in value must be declared and written in the Register for this purpose, held by the Chief Executive.

4. Funds and Resources

- 4.1 You must not misuse the association's funds or resources.
- 4.2 You must comply with NCHA's Financial Regulations, Authority Levels Procedure and the Financial Procedures Manual regarding the use of its funds and resources. 'Resources' includes staff, information, telephone, computer and other IT facilities, equipment, stationery and transport. A copy of the Financial Regulations and other financial procedures are available in all work-bases, from NCHA's intranet (Igloo) or the Finance Department.
- 4.3 You must ensure that the organisational funds, monies and resources entrusted to you are used efficiently, economically and effectively and for the purpose for which they were intended.
- 4.4 You must comply with the association's policies and procedures regarding tendering and procurement, ensuring value for money and fairness in decision-making.
- 4.5 You must take reasonable measures to protect the association's funds, resources, property and assets from theft, damage, misuse and waste.
- 4.6 You must comply with the association's policies and procedures relating to the acceptable or unacceptable use of e-mail, intranet and internet services. Amongst other things, these policies and procedures prohibit access to pornographic or racist material, and the use of unauthorised or unlicensed software.
- 4.7 You must claim reimbursement only for expenditure that was properly and reasonably incurred in carrying out the association's business. You must ensure that any expenses claim you make is accurate and complies with the association's policies and procedures.

- 4.8 You must not involve customers in gambling syndicates (e.g. National Lottery). This does not prevent the customer from choosing to enter a syndicate with other customers and being supported to do so, but you should not be part of this syndicate.
- 4.9 You must not incur a financial liability on behalf of a customer.
- 4.10 You must not take responsibility for looking after valuables on behalf of a customer. This relates to individual staff and does not preclude you from making arrangements with customers for storing valuables, as long as appropriate recording and insurance is undertaken.
- 4.11 Selling or trading goods or services to customers is prohibited.
- 4.12 You, your close relatives, or any business run for profit with which you or your close relatives are connected are prohibited, from receiving any benefit, grant, or loan from NCHA. The contract of employment and reimbursement of any legitimate expenses are not covered by this prohibition. Any payments received in breach of this provision will be recovered.

5. Confidentiality

- 5.1 You must handle information in accordance with the law and the association's policies and procedures.
- 5.2 You must comply with the provisions of the Data Protection Act 1998 which governs the protection of personal data. All personal data held about customers, applicants, employees and others, whether on paper or electronically, is subject to the provisions of the Act. The association's policies and procedures give further guidance.
- 5.3 You must not disclose without authority any confidential and/or commercially sensitive business information provided to or belonging to NCHA or gained in the course of your work. This duty continues to apply after you have left the association or relinquished your position.
- 5.4 You must not, without permission, pass or distribute to the press or media or any other external recipient(s) information or materials relating to the association.
- 5.5 In your capacity as a board or staff member you must not, without prior authority:
- appear to represent the views or position of the association;
 - write letters to the press or other recipient(s);
 - write media articles, blog posts or tweets etc., about the association and its activities;
 - make comments or statements to the media – if approached you must pass the enquiry to the appropriate person.

5.6 You must not prevent another person from gaining access to information to which they are entitled by law.

6. Respect for Others

6.1 You must treat others with respect at all times.

6.2 You must comply with the law and with the association's policies and procedures relating to equality and diversity. Equality laws prohibit discrimination on grounds including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and impose positive duties to eliminate unlawful discrimination and promote equality. The association's policies give further guidance.

6.3 You must not harass, bully or attempt to intimidate any person. The association's policies give further guidance.

6.4 You must not display materials in the workplace which other people might reasonably find offensive or use language which Board or work colleagues or customers might reasonably find offensive.

6.5 The service and care provided to customers must:

- be provided with their consent (or by a person able to lawfully consent on their behalf);
- be appropriate;
- meet their needs;
- reflect their preferences; and
- be provided in a safe way

6.6 Customers must be protected from abuse and improper treatment and any suspicions or concerns you have should be reported in accordance with the Adult Safeguarding or Speak Out policies and procedures.

6.7 If customers lack mental capacity or are detained under the mental health legislation, you must act in accordance with the Mental Capacity Act 2005 and/or the Mental Health Act 1983.

6.8 You should treat customers with dignity and respect and they should not be subjected to any degrading treatment or treated in a manner that could be viewed as degrading. This includes ensuring their privacy is respected, supporting their autonomy, independence and involvement in the community and having regard to their protected characteristics under the Equality Act 2010.

6.9 You must ensure that any complaints from tenant or services users are dealt with promptly in accordance with the relevant policy.

6.10 You must inform your line manager if you have any concerns regarding your ability to provide the planned service or care for a tenant or service user.

6.11 NCHA Care and Support employees are required to observe the Skills for Care and Skills for Health 'Code of Conduct for Healthcare Support Workers and Adult Social Care Workers in England' provided during induction.

6.12 Employees providing care services must also comply with the fundamental standards of care and provide person centred care as detailed in this section and includes;

- If providing nutritional support, the nutrition and hydration provided must be adequate to sustain life and good health, and take account of nutrition and hydration assessments (which will also include detail of cultural needs, preferences and allergies etc.);
- Ensuring that all premises and equipment are clean, secure, fit for purposes and properly maintained and reporting any issues that are not able to be resolved immediately;

7. Relationship between board members and staff and involved customers

7.1 Board members and staff and involved customers must maintain a constructive, professional relationship based on a sound understanding of their respective roles.

7.2 Board Members – you have a duty of loyalty and support towards the association and this must be reflected in a constructive, professional relationship with its staff.

7.3 You must not go beyond your role as a board member and become inappropriately involved in operational matters.

7.4 In your dealings with staff, formally and informally, 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 association.

7.5 Board members and involved customers – where it is necessary to raise issues of poor staff performance at a formal meeting, these must be raised in a constructive way, aimed at getting things right in future, and not at criticising individuals. Any concerns about the performance of individuals must be discussed in confidence with the Chair of the Board, committee or panel, or with the Chief Executive.

7.6 You must not appear to undermine the authority of a senior officer in their dealings with a more junior member of staff.

7.7 You must avoid inappropriate personal familiarity with members of staff.

7.8 You must not ask or encourage a member of staff to act in any way which would conflict with compliance with this code or the association's policies and procedures.

- 7.9 Staff members – if your work brings you into contact with the board, a Committee or a customers' committee or panel, you must:
- take direction from the board, or in accordance with any delegated authority of a committee or panel;
 - respond constructively to questioning or challenge;
 - respond willingly to requests for information.
- 7.10 You must avoid inappropriate personal familiarity with board members and involved customers
- 7.11 You must not use informal channels to lobby or influence board members or involved customers on matters of the association's business.
- 7.12 You must not knowingly mislead the board or any of the association's committees or panels. In presenting information you must set out the facts and relevant issues truthfully.
- 7.13 Involved customers - must not seek to instruct or direct a member of staff or contractor. The relevant manager or member of staff must convey all instructions.

8. Relationship with customers and other service users

- 8.1 You must maintain high standards of professionalism, fairness and courtesy in all your dealings with customers
- 8.2 You must treat all customers with courtesy and respect.
- 8.3 You must not allow any personal relationship with a resident or other service user to conflict with your role and responsibilities.
- 8.4 You must not give gifts or loans of money to, or receive loans or gifts of money from, customers– in accordance with 3.6 above.
- 8.5 You must take great care in handling customers' money, ensuring that a receipt is completed for every transaction.
- 8.6 You must not invite or influence a resident or other service user to make a will or trust under which you are named as executor, trustee or beneficiary.
- 8.7 When handling information relating to customers, you must comply with the law and the association's policies and procedures relating to the protection of personal data.
- 8.8 You should not take any unauthorised person (including children) or pets into the customers home without permission of the service user/tenant, their relatives or representatives and the manager of the service/department.

9. Health, safety and security

- 9.1 Your conduct must not endanger the health, safety or security of yourself or others.
- 9.2 You must comply with the association's health and safety policies and procedures and bring to the attention of the appropriate person any risks to yourself or others. In particular:
 - (1) where you are provided with personal protective equipment this must be worn/used; and
 - (2) for your own safety, you must comply with the association's policy and procedures relating to lone working.
- 9.3 You must comply with the law and the association's policies on smoking and on the use of alcohol, illegal drugs and other substances.
- 9.4 You must comply with the association's policies relating to the security of premises.

10. Conduct at meetings

- 10.1 Your conduct at meetings must show respect for all, and comply with the association's standards and relevant Code of conducts.
- 10.2 You must be courteous to all other attendees, and respect the position of the meeting chair.
- 10.3 You must not use threatening or aggressive behaviour, or act in a disruptive way.
- 10.4 You must not attend meetings while intoxicated or under the influence of drugs.
- 10.5 Once a board, committee or panel meeting has properly reached a decision, you must share responsibility for that decision, even where you had not supported it.

11. Representing the association

- 11.1 In representing the association at external events and in dealings with outside bodies, you are an ambassador for the association and must uphold and promote its values, objectives and policies.
- 11.2 You must not become involved in, or be seen to endorse, any activity that may bring the association into disrepute. This includes but is not limited to illegal, immoral, racist or other discriminatory activity.
- 11.3 In engaging in activities which promote the work of the association to the outside world, you must demonstrate commitment to the association and support for its values, policies and goals.
- 11.4 In representing the association at formal or informal events, you must be appropriately dressed for the occasion.

11.5 You must declare to the Chair of Board/your manager any criminal convictions/cautions received during your term of office/ employment with NCHA as soon as reasonably practicable after the sanction has been imposed.

12. Learning and Development

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

12.2 You must play an active part in the association's performance management processes and welcome constructive feedback.

12.3 At the appropriate induction, appraisal or supervision meeting, you must make clear your personal training and development needs, so that they can be taken into account in the association's forward budgeting and planning.

12.4 NCHA has a regular cycle of compliance training. This training has been highlighted to ensure NCHA meets its regulatory and legal responsibilities, as well as being in line with NCHA's business values. It is the responsibility of all employees to ensure that relevant training is completed on time, and refreshed in line with our published compliance training cycle.

12.5 Unless there are exceptional reasons, you must attend all learning and development events that have been arranged, either for you alone or as part of a group.

12.6 Board members – You must take responsibility for keeping your knowledge up to date in those areas in which you are a specialist.

13. Reporting Concerns

13.1 You must report any reasonable and honest suspicions you may have about possible wrongdoing to the appropriate person (Head of People, Director, Auditor or the Chief Executive), who will ensure that the matter is investigated as per the Speak Out policy which can be found in the Staff Handbook. Failure to do so may, in itself, be a disciplinary matter.

13.2 If you are aware of potentially dishonest or fraudulent activity, or material breaches of this code – by board members, staff or others – you must report it to the appropriate senior person within the association. The association's policies and procedures relating to fraud and confidential reporting (Speak Out) give further guidance.

13.3 If you believe that you are being required to act in a way which conflicts with this code, you must report it to the appropriate senior person within the association.

13.4 You must not victimise any person who has used – or intends to use, or is suspected of having used – the association's confidential reporting procedures to report the misconduct, or alleged misconduct, of others.