

## Code of Conduct

### 1 Purpose

- 1.1 This code commits staff and board directors to standards of expected conduct.

### 2 Statement

- 2.1 It is vital for the reputation of social housing that everyone who works for, or represents, a social housing provider is held to the highest standards of conduct. This Code sets standards appropriate for housing associations that are members of the National Housing Federation. The Code is for use by individual staff, Board members and certain involved residents.
- 2.2 The board is ultimately responsible for the actions, policies, and work of CHG. It is its responsibility to make sure that all those concerned can comply with this Code. The board and senior staff have responsibility to set an appropriate framework of policies, delegations, and procedures. A culture must be promoted which enables and supports all individuals to meet their responsibilities, as set out in the Code and deliver the best possible service for residents and customers. Arrangements shall be in place for people to ask for further information or guidance they may need about the application or detail of this Code.
- 2.3 The Code is structured in four parts:
- 2.3.1 1) **Acting in the best interests of CHG and its residents:** a responsibility to carry out a role in line with the social purpose.
  - 2.3.2 2) **Behaving with integrity:** the reputation and good name of CHG depends in part 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.
  - 2.3.3 3) **Professional conduct and treating others well:** 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.
  - 2.3.4 4) **Protecting yourself, others, and the environment:** responsibility while on CHG business to protect health, safety, security and wellbeing, and, where reasonable, to make the most positive possible environmental impact.

### 3 Application of the Code

- 3.1 Individuals shall automatically be subject to the Code by entering into a contract of employment or contract for services with CHG. Contracting firms should also adhere to the code, subject to provisions of the code being written into contract provisions. It shall be the responsibility of the employee or person/firm to appraise themselves of the content and conduct themselves accordingly.
- 3.2 Related policies and procedures may also contain provisions of the Code and the Code itself may reference those policies and procedures.
- 3.3 Persistent and clear breaches of the Code shall be dealt with in accordance with either disciplinary procedures for employees, or dispute resolution provisions in other contracts.

#### **4 Responsibilities**

- 4.1 The person responsible for this code shall be the Chief Executive.

#### **5 Performance, Monitoring and Evaluation**

- 5.1 There shall be a number of policies and procedures associated with this code, such as an anti-bribery and corruption policy. Each associated policy shall have its own monitoring and reporting obligations.

## Part 1: Acting in the best interests of CHG and its residents

### A: Meeting your responsibilities

#### The principle

You must fulfil your duties and obligations responsibly, always acting in good faith and in the best interests of CHG and for the delivery of its strategic objectives.

#### Expected of all

- 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.
- A2 In carrying out your role, you must always seek to further CHG's strategic objectives, reflecting CHG's desired culture.
- 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.
- A4 You must consider the impact of your actions on the safety and wellbeing of residents.

#### Expected of board members

- A5 You must respect the principle of collective decision-making and corporate responsibility.
- A6 You must ensure that you declare to CHG 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 of staff members

- 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.

## Part 1: Acting in the best interests of CHG and its residents

### B: Representing Cromwood Housing Group

#### The principle

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

#### Expected of all

- B1 In representing CHG, you must act in accordance with its values, policies, and goals.
- B2 You must not conduct yourself in a manner that could reasonably be regarded as bringing CHG into disrepute.
- B3 You must not make derogatory, false, or otherwise damaging comments, in person or through any medium, about CHG or any person, service or organisation connected with it.
- B4 You must not seek to officially represent the views or position of CHG without prior authority.
- B5 You must adhere to CHG's policies in the use of email, intranet and internet services including social media.
- B6 When representing CHG through any medium, including social media, you must always act with professionalism.
- B7 Where any personal social media accounts refer to your role with CHG, you must make it clear in what capacity you are communicating.
- B8 If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect CHG, 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

- B9 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.

## Part 2: Behaving with integrity

### C: Conflicts of interests

#### 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 of all

- C1 You must formally declare to CHG, 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.
- C2 You must declare any known relationship to a person applying for or performing a role within CHG and must not be involved in their appointment, performance management or reward.
- 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 CHG or seek or accept preferential treatment for them.
- 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.
- C5 Except where specifically permitted, as set out in CHG's relevant policy, you must avoid using its contractors and suppliers for private purposes.
- 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

- 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.

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### **Part 2: Behaving with integrity**

#### **D. Bribery, gifts, and hospitality**

##### The principle

In your role with CHG, 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 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 of all

- D1 You must not solicit or seek gifts or hospitality or other benefits.
- D2 Any gifts or hospitality offered to or by you must be either declared or declined according to your CHG's policies.
- 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.

#### **E. Funds, resources, and personal benefit**

##### The principle

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

##### Expected of all

- E1 You must ensure that CHG's funds and resources are used properly and efficiently.
- E2 Your procurement decisions must be guided by CHG's policies and fairness in decision-making and in line with relevant law.
- E3 You must take all reasonable measures to protect CHG's funds, resources, property and assets from fraud, theft, damage, and misuse.
- E4 If you claim reimbursement for any expenses, you must do so in line with CHG's policies and procedures.

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### Part 2: Behaving with integrity

#### F: Confidentiality

##### The principle

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

##### Expected of all

- F1 You must not disclose, without the required permission and authority, any personal data about tenants, customers, staff, or colleagues.
- F2 You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left CHG or stepped down from your position.
- 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 CHG's whistleblowing policy and procedure.
- F4 You must not prevent another person from gaining access to information to which they are entitled to by law.

#### G. Reporting concerns

##### The principle

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

##### Expected of all

- G1 If you have a concern about 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.
- 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.
- G3 You must not victimise or disadvantage any person who uses or intends to use CHG's confidential reporting (whistleblowing) procedures to report actual or alleged wrongdoing.

## Part 3: Professional conduct and treating others well

### H. Respect for others

#### The principle

You must treat all others with respect and consideration.

#### Expected of all

- H1 You must treat everyone you meet in the performance of your role with equal respect, care, and consideration.
- H2 You must show respect for individuals' chosen identities.
- 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.
- 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.
- H5 You must not display materials in your workplace or use language in the performance of your role which other people might find offensive.
- 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.

## **Part 3: Professional conduct and treating others well**

### **I: 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 of all

- I1 You must seek and value views from residents and other customers when making decisions that will affect them.
- I2 You must not allow any personal relationship with a resident or other customer to influence how you discharge your role and responsibilities.
- 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.
- 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.
- 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.

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### Part 3: Professional conduct and treating others well

#### J: 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 of all

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

##### Expected of board members

- J2 Your relationships with staff and involved tenants must be constructive and professional.
- 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 CHG.

##### Expected of board members and involved residents

- J4 Where it is necessary to raise issues of staff, board or contractor performance, these must be raised constructively and through the appropriate channels.
- 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.
- J6 You must behave in a professional manner, always maintaining independence and integrity. This will include avoiding inappropriate personal familiarity with members of staff.
- 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 of staff members

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

## Part 3: Professional conduct and treating others well

### K. Learning and development

#### The principle

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

#### Expected of all

- K1 You must play an active part in the CHG's supervision and performance appraisal processes as applying to you.
- K2 You must offer open and constructive feedback to others and invite feedback about your own performance.
- K2 You must make your personal training and development needs relevant to your role known to the association.
- K3 Unless there are exceptional reasons, you must attend learning and development events as required.

#### Expected of board members

- K4 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.

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### **PART IV: Protecting yourself, other people and the environment**

#### **L. 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

- L1 You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk.
- 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.

#### **M. Protecting the environment**

##### The principle

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

##### Expected of all

- M1 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

- M2 You should consider the long-term environmental impact of your decisions.

#### **6 Purpose**

- 6.1 This policy [one short paragraph that captures the essence of the policy].

#### **7 Policy Statement**

- 7.1 [A series of paragraphs highlighting the key provisions of the policy and the basis in law and regulation that it shall adhere to].
- 7.2

### **8 [Heading]**

8.1 [Further detail relating to specific matters addressed in the policy statement].

8.2

### **9 [Heading]**

9.1 [Further detail relating to specific matters addressed in the policy statement].

9.2

### **10 Responsibilities**

10.1 [The job holder or holders responsible for applying and monitoring this policy].

### **11 Performance, Monitoring and Evaluation**

11.1 [The data/records collected to support policy performance, and where and when performance will be reported, and evaluated].

11.2 This policy will be subject to review no later than three years from the date of approval, or sooner if a substantial change in circumstances requires.