

CHARING CROSS HOUSING ASSOCIATION

STAFF CODE OF CONDUCT

1.0 INTRODUCTION

Charing Cross Housing Association attaches the greatest importance to ensuring that high standards of behaviour are demonstrated by all of our people and in all of our activities. Additionally, as a Registered Social Landlord (RSL), the Association is required to adopt and comply with an appropriate Code of Conduct that fully meets with the Regulatory Standards set by the Scottish Housing Regulator (SHR).

The Association therefore has a Code of Conduct in place that all members of staff are expected to accept and adhere to. The Code is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations and Employers in Voluntary Housing – Supporting Social Employers (EVH). The Scottish Housing Regulator (SHR) has confirmed that this Code fully complies with its Regulatory Standards.

2.0 WHO THE CODE APPLIES TO

This Code of Conduct applies to everyone employed on a permanent or temporary, full-time or part-time contract by Charing Cross Housing Association.

3.0 YOUR RESPONSIBILITIES

As a member of staff you have the responsibility to;

- Make yourself familiar with the terms of the Code
- Act in accordance with the Code at all times
- Make yourself familiar with, and comply with all of the Association's policies and procedures
- Seek guidance from a manager if you are unclear on any aspect of the Code or related policies or on how to apply the Code in a particular situation.

4.0 HOW THE CODE IS STRUCTURED

The Code is based on the Nolan Principles on Standards in Public Life which are recognised as defining good conduct for those who work for the public using public money.

There are three main identified groups of principles that form the basis for the Code, these being;

1. Honesty & Integrity
2. Openness & Accountability
3. Selflessness, Objectivity & Leadership

For each of the groups, the Code provides a statement of principle and a number of provisions which set out the requirements of the Code in more detail.

The Code is not exhaustive and all staff members of Charing Cross Housing Association are responsible for ensuring that their conduct at all times meets the high standards that both the Association and the RSL sector are recognised for upholding.

As well as observing the detail of the Code, you should apply its intention and spirit to all situations on employment.

5.0 THE PRINCIPLES OF THE CODE OF CONDUCT

Principle 1 – HONESTY & INTEGRITY

You must act at all times with honesty and integrity.

You must not use, or seek to use, your position to gain financial or other benefit for yourself, your family or friends.

1.1 Gifts and Hospitality

- You must act, and be seen to act wholly in the interests of our organisation, our residents and other service users. You should not benefit improperly from your position.
- You must not accept any offers of gifts or hospitality from individuals or organisations which might reasonably create – or be capable of creating – an impression of impropriety, influence or place you under an obligation to these individuals or organisations.
- You must comply with the Association's **Entitlements, Payments & Benefits Policy** which provides guidance on how you should deal with offers of gifts and hospitality, including when such gift can and cannot be accepted.

1.2 Prevention of Bribery

- The Association must comply with anti-bribery legislation and will therefore adopt, and comply with, anti-bribery and corruption policies.
- All forms of bribery - meaning a financial or other advantage or

inducement intended to persuade someone to perform improperly any function or activity – are expressly forbidden.

- You must not offer, seek or accept bribes and must comply with the Association's policy on bribery.
- Offering, seeking or accepting bribes will result in disciplinary action and may also result in criminal prosecution.
- You must report to your manager any instances of suspected bribery within the organisation or any external organisation with which we have dealings.

1.3 **Personal Benefit**

- The Association's **Entitlements, Payments & Benefits Policy** outline the requirements should you wish to procure the services of any of the contractors and suppliers on the Association's approved list for your own personal use.
- You, or someone closely connected to you, cannot receive preferential treatment relating to any services provided by the organisation or its contractors/suppliers, as a result of your role with the Association. If required you should be able to demonstrate that this is the case.
- You must not use, or seek to use, your position to promote your personal interests or those of any person with whom you are closely connected or the interests of any business or other organisation with which you have a connection.

Section 3 of Appendix 1 defines what is meant by 'closely connected'.

1.4 **Resources, Facilities and Premises**

- You must use our resources, facilities and premises only for the purposes intended and in a responsible and lawful manner. This includes office premises, telephone, computer and other IT facilities, equipment, stationery, transport and staff.
- Reasonable personal use of office telephones and computers and company mobile telephones is permitted but must be kept to a minimum. The Association's **Staff Handbook** and **Policy on Communication Tools** gives further information including what is meant by 'reasonable personal use'.

- You must comply with all of our relevant policies, including (but not exclusively) usage of internet & email social media, health & safety, equal opportunities and dignity at work.
- You must not undertake work for another organisation - or for any personal business – on Charing Cross Housing Association’s premises nor use our resources or facilities for such a purpose, unless you have specific permission from the Director.

1.5 Funds and Expenses

- Our funds must be safeguarded from abuse, theft or waste. You must at all times apply and observe all of the Association’s financial regulations and internal controls.
- You must comply with the Association’s relevant policies when procuring goods/services or claiming expenses.

1.6 Tenants/Service Users and Money

- As a general rule, in relation to tenants and service users you must not;
 - Give or loan them money
 - Receive a gift or loan of money from them
 - Invite or influence them to make a will or trust under which you are named as executor, trustee or beneficiary.
- In circumstances where you have a declared family or close connection to a tenant/service user, common sense will be applied and the Association would not seek to impose restrictions on the private exchange of money between you and that individual.

1.7 General Responsibilities

- You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.
- You should be aware that under the Equality Act 2010, the following nine characteristics are specifically protected: age; disability; gender reassignment, marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.
- In presenting information you must set out the facts and relevant issues truthfully.
- You must avoid any situation that could give rise to suspicion or suggest improper conduct.

Principle 2 – OPENNESS & ACCOUNTABILITY

You must declare all relevant personal interests.

You must handle information in accordance with our policies and procedures.

You must report to the appropriate senior person within Charing Cross Housing Association any reasonable and honest suspicions you may have about possible wrongdoing.

2.1 Declaring Interests

- The Association must ensure that no conflict arises, or could reasonably be perceived to arise, from your duties as a member of staff and your personal interests, financial or otherwise. You must therefore declare and manage openly and appropriately any actual or potential interests or conflicts.
- Where you have a personal, business or financial interest in any matter that is relevant to our activities or is being considered (or is likely to be considered), or you know that someone to whom you are closely connected has such an interest, you must declare it promptly and record it in our Register of Interests.
- You must keep your entry in the Register of Interests complete, accurate and up to date.

2.2 Handling Information

- You must observe and uphold the legal requirements and our policies in respect of the storage and handling of information, including personal and financial information. The Association's **Data Protection Policy** gives further guidance.
- You must respond to requests for information positively and must not prevent people or bodies from being provided with information that they are entitled to receive.
- You must not use confidential information acquired through your work as one of the Association's employees for your private interests or any other purpose for which it is not intended.

2.3 Respecting Confidentiality

- You must respect confidentiality and ensure that you do not disclose information to anyone who is not entitled to receive it, both whilst you are a

member of staff and after you have left the Association's employment.

- Unless specifically authorised to do so, you must not make comments or statements in public or to the media, or pass any documents or other information to the press or media about us or our activities. If you are approached by the press or other media you must quickly pass the enquiry to the Director.
- You must not publish any material, deliver any lecture or address any issues relating specifically to the Association or its activities without prior approval.

2.4 Using Social Media

- The Association respects your right to a private life, and that includes joining any social media sites that you wish. However, as information posted on such sites is classed as public and not private, you must not disclose any private or confidential information relating to the Association, its customers, partners, suppliers, board members, or employees on any social networking sites, bulletin boards, blogs or similar. This applies whether you are posting under your own name or a pseudonym.

NOTE: Also see section 3.3 under "Upholding our reputation"

2.5 Reporting Concerns

- If you become aware of any actual or potential fraud, corruption or wrongdoing, or breaches of this Code, you must report this to your manager or the Director on a confidential basis. The Association's **Whistleblowing Policy** gives further information.
- You must not victimise any person who has used - or intends to use, or is suspected of having used – the Association confidential reporting or whistleblowing procedures to report any actual or alleged fraud, corruption or wrongdoing by others.

Principle 3 – Selflessness, Objectivity and Leadership

You must act in the best interests of Charing Cross Housing Association at all times within the framework set by the organisation, working to promote our aims and objectives, upholding our values and setting a good example by your own conduct.

3.1 **Fulfilling Your Role**

- You must comply with your terms of appointment and the Association's policies and procedures relating to your role.
- You must fulfil your duties responsibly, exercising reasonable skill and care and acting at all times in best interests of the Association, its tenants and other service users.

As an organisation, the Association will always aim to put the needs of its tenants and service users first, and we expect all of the staff to do the same in their day to day work, within the framework of our policies and procedures.

- You must work to promote aims and objectives of the Association and in accordance with the relevant legal and regulatory requirements (including those, as applicable, of the Scottish Housing Regulator, the Office of the Scottish Charity Regulator, the Financial Conduct Authority and the Care Inspectorate).

If you are in doubt as to the legal and regulatory requirements that are relevant to your role you must seek guidance and from your line manager.

- You must work at all times in accordance with the Association's policies and procedures and not allow your own personal or political opinions to affect the way in which you carry out your duties. This does not impinge on your right to be an active citizen or, for example, to be an active trade unionist.
- You must take direction from your line manager, other senior managers and the Management Committee, and exercise responsibly any authority that comes with your role as a staff member.
- You must not seek to use informal channels to influence the Management Committee regarding decisions to be made about the conduct of our business.
- You must consult your manager before taking on any outside work or any position (paid or unpaid) that will in any way impact on your role with Charing Cross Housing Association. Any such work or position must not interfere with your existing job or conflict with our interests.

Appendix 1 gives more details on declaring interests

- You must participate in any necessary training, and play an active part in our performance appraisal process. You will contribute to the identification of any personal training needs you may have in order to keep your professional skills and knowledge up to date.

3.2 Working with Tenants and Other Service Users

- You must maintain high standards of professionalism, fairness and courtesy in all your dealings with tenants and other service users.
- You must not allow any personal relationship with a tenant or other service user to conflict with the conduct of your role and responsibilities.
- You must use the appropriate channels for handling tenancy and service provision issues. You must not act outside the Association's established procedures in any matter concerning any tenant or other service user.

3.3 Upholding the Reputation of Charing Cross Housing Association

- You must not act in a way that could reasonably be regarded as bringing the Association into disrepute. This would include publicly making any derogatory comments about the organisation, its staff, Management Committee members, service users, partners and anyone that it is doing business with.
- If you have a grievance or concern relating to a member of staff or of the Management Committee or have any concern about potential wrongdoing you should discuss it with your line manager or with the Director.
- You must always be a positive ambassador for the Association and its work, especially when attending events as a member of staff or in dealing with outside bodies.

3.4 Showing respect for others

- You must treat others with respect at all times. This includes considering the views of others and being tolerant of differences.
- You must adhere to both the letter and the spirit of the Association's **Equality and Diversity Policy**.
- You must always conduct yourself in a courteous and professional manner.
- You must not, by your actions or behaviour, cause distress, alarm or offence.
- You must not harass, bully or attempt to intimidate any person.
- You must take care when displaying materials in the Association's office, and ensure that these would not reasonably cause offence to your colleagues. If in doubt, consult your line manager before displaying any materials.

- When attending meetings, you must be courteous to all attendees and respect the position of the meeting chair or convenor. You must also ensure that mobile phones are switched off/on silent other than in very exceptional circumstances where it is necessary to take an urgent call.

6.0 BREACH OF THE CODE

As a member of staff you have a responsibility to promote and uphold the requirements of this Code. If you consider that you may have breached the Code, or have witnessed or become aware of a potential breach by another staff member, you should immediately bring the matter to the attention of a senior manager.

Any material breach of the Code will be considered under the Association's **Disciplinary Procedures** and may result in action being taken against you which may include dismissal.

As a member of staff you have a duty to co-operate with and contribute to any investigation relating to a potential breach of the Code or an associated matter

You will be required to sign a Statement of Acceptance of the Code to confirm that you have read and understood the terms of the Code and your personal responsibility to uphold the requirements of this Code.

1.0 INTRODUCTION

The Association recognises that being a member of staff at Charing Cross Housing Association staff is only one part of your life. Other aspects of your life - such as family, friends and neighbours, voluntary work, causes you support, possibly business or financial interests, possibly your own housing arrangements - may have the potential to cross over into your role as a staff member.

However, as an organisation that works for the community and uses public funds, it is essential that there is no conflict - and that there can be no reasonable perception of conflict - between your duties as a member of staff and your personal or personal business or financial interests.

Any potential conflict between your position as a member of our staff and your other interests must be openly declared and effectively managed so as to protect the good reputation of Charing Cross Housing Association and the RSL sector.

As stated in the Code you must promptly declare and record in the Register of Interest where you have a personal business or financial interest in any matter that is relevant to the Association's activities or is being considered or is likely to be considered or you know that someone to whom you are closely connected has such an interest.

2.0 EXAMPLES OF INTERESTS THAT MUST BE DECLARED

The following are examples of the kind of interest that you must declare.

Please note that this list is not exhaustive, and there may be other interests that you should also declare.

- Tenancy of a property (by you or someone to whom you are closely connected) of which Charing Cross Housing Association is the landlord.
- Occupancy or ownership of a property (by you or someone to whom you are closely connected) which is factored or receives property related services from Charing Cross Housing Association
- Receipt of care or support services from the Association.
- Membership of a community or other voluntary organisation that is active in the areas the Association serves.
- Voluntary work with another RSL or with an organisation that does, or is likely to do, business with Charing Cross Housing Association.
- Membership of the governing body of another RSL.
- Being an elected member of any local authority where the Association is active.

- If you purchase goods or services from the Association or from one of its approved contractors or Framework Agreement partners.
- Significant shareholding in a company that the Association does business with.
- Membership of a political, campaigning or other body whose interests and/or activities may affect the Association's work or activities.
- Ownership of land or property in the Association's areas of operation excluding for the purpose of your own residential use (i.e. there is no requirement for you to declare any house in which you currently live).
- Unresolved dispute relating to the provision of services in connection with a tenancy or occupancy agreement or a contractual dispute over the provision of goods or services with Charing Cross Housing Association.

If you are not sure whether a certain matter needs to be declared, you must seek guidance from your manager. If doubt remains, the advice would always be to declare the matter.

You should note that in some circumstances, declaration of an interest may not be sufficient, and that it may be necessary for the Association to take additional measures to deal satisfactorily with the situation so as to protect the probity and reputations of both yourself and the organisation.

3.0 DEFINITION OF 'CLOSE CONNECTION'

Someone 'closely connected' to you includes family members and persons who might reasonably be regarded as similar to family members even where there is no relationship by birth or in law.

The following table outlines those who you should consider when declaring interests:-

Group 1 Members of your household	Group 2 People closely associated with you	Group 3 Others you need to consider
Anyone who normally lives as part of your household, whether they are related to you or not, including spouses/partners who work away from home and sons and daughters who are studying away from home	Parents, parents-in-law and their partners Sons and daughters; stepsons and step-daughters and their partners Brothers and sisters and their partners A partner's parent, child, brother or sister Grandparents, grandchildren and their	Other relatives (e.g. uncles, aunts, nephews & their partners) Other friends (e.g. someone you are acquainted with socially, neighbours, business contacts/associates)

	partners Someone who is dependent on you or whom you are dependent on Close friends	
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If you become aware of any action or involvement relating to **anyone** in the table then you should declare and manage this as soon as possible.

Please note, there is an expectation that you will be familiar with the actions of members of your household (Group 1) and of any other people listed in the table above with whom you are closely associated and/or in regular contact and you must take steps to identify, declare and manage these.

However, we recognise that you will not always be closely acquainted with or in regular contact with all of the people listed and you are not expected to go to unreasonable lengths to identify actions or involvement that are covered by this policy. In particular, you are not expected to be aware of the actions of people in groups 2 and 3 that you do not have a close association and/or regular contact with nor are you expected to research into the employment, business interests and other activities of all persons with whom you are closely connected.

When considering your actions in relation to declaring an interest you should do so from the point of view of a reasonable and objective observer.

4.0 DECLARING PERSONAL INTERESTS

On appointment new members of staff will be required to complete a **Register of Interest Form** to register any personal interests that could potentially conflict with their role.

All relevant declared interests must be recorded in the **Declaration of Interests Register**. A new form needs to be completed whenever there is a material change.

It is the responsibility of each member of staff to keep their entry in the Register of Interests up to date, add any new interests as soon as they arise, and amend existing interests as soon as any change takes effect.

In the event that you are invited to be present at a meeting where a matter in which you have a personal or a personal business or financial interest is discussed you must inform the meeting chair at the start of the meeting, or as soon as you become aware that this is the case. You would then be required to leave the meeting for the duration of the particular item. If in any doubt, you should ask the meeting chair or another senior person present for guidance.

This applies to all meetings that you attend as a member of staff of Charing Cross Housing Association – both internal and external.

Any failure to make a complete, accurate and prompt declaration - whether deliberately or through taking insufficient care - will be regarded as a breach of this Code.