



<b>Policy Title:</b>	<b>Code of Conduct (Staff)</b>
<b>Policy Manual Section:</b>	<b>Governance</b>
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This document will be made available in different languages and formats on request, including Braille and audio formats.

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## 1.0 Introduction

- 1.1 Cadder Housing Association (the Association) is a highly respected and reputable organisation delivering services to its tenants in Cadder and other customers. The conduct of our staff and other stakeholders is essential in maintaining the reputation of the RSL sector and the Association.
- 1.2 *There are references throughout this Code of Conduct (the Code) to 'you' and 'your' which means the member of staff of Cadder Housing Association who has signed this Code. References to 'we', 'us' and 'our' mean Cadder Housing Association.*
- 1.3 The 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.
- 1.4 This Code of Conduct sets out the standards of conduct required of each member of the Association's staff team.
- 1.5 As a Registered Social Landlord (RSL), we are required to adopt and comply with an appropriate Code of Conduct<sup>1</sup>. This Code is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations and EVH<sup>2</sup> – Supporting Social Employers. The Scottish Housing Regulator (SHR) has confirmed that this Code fully complies with its Regulatory Standards and their input during the production of this code is acknowledged
- 1.6 Every staff member must ensure they are familiar with the terms of this Code and act in accordance with its requirements at all times. Staff will be required to sign the Code (in the 'Statement of the Acceptance' at the end) to confirm that they have read and understood the terms of the Code and accept personal responsibility to uphold the requirements of this Code.
- 1.7 Each staff member must also ensure they are familiar with, and comply with all of the Association's policies associated with the Code of Conduct.
- 1.8 If there are any aspects of this Code, or of any of the related policies, on which staff are unclear, they must seek guidance from their Sectional manager. The manager will also be able to give guidance where a staff member is unsure how the Code or related policies apply in a particular situation.

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<sup>1</sup> Scottish Housing Regulator, April 2012, [Standards of Governance and Financial Management](#): Standard 5 and guidance 5.24.

<sup>2</sup> Employers in Voluntary Housing

## 2.0 Who the Code applies to

- 2.1. This Code of Conduct applies to everyone who works for the Association whether employed directly or otherwise.
- 2.2. A copy of this Code will be given to every person that it applies to.

## 3.0 How the Code is structured

- 3.1. The Code is based on the Nolan Principles on Standards in Public Life<sup>3</sup> which are recognised as defining good conduct for those who work for the public using public money.
- 3.2. We have defined three groups of principles as the basis for the Code:
  - Section A - Honesty and Integrity p4-6
  - Section B - Openness and Accountability p7-8
  - Section C - Selflessness, Objectivity, Leadership p9-11
- 3.3. Each of the three sections begins with a statement of principle. This is followed by a number of provisions which set out the requirements of the Code in more detail.

**The Code is not exhaustive and it should be remembered that all staff members of RSLs are responsible for ensuring that their conduct at all times meets the high standards that the RSL sector is recognised for upholding. As well as observing the detail of the Code, staff should apply its intention and spirit to all situations in employment.**

**Staff members are required to sign the Statement of Acceptance at the conclusion of this code on page 12 which also outlines the implications for any breach of the code.**

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<sup>3</sup> Committee for Standards in Public Life 1994, [Nolan Principles on Standards in Public Life](#)

## The Code of Conduct

- A. Honesty and Integrity: Staff must act at all times with honesty and integrity. They must not use, or seek to use their position to gain financial or other benefit for their self, their family or friends.**

### Gifts and hospitality

- A.1 Staff must act, and be seen to act, wholly in the interests of our organisation, our residents and other service users. Staff should not benefit improperly from your position.
- A.2 Staff 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 them under an obligation to these individuals or organisations. Staff must comply with the Association's Gifts and Hospitality Policy.

### Prevention of bribery

- A.3 The Association's staff must comply with anti-bribery legislation. We must adopt, and comply with, anti-bribery and corruption policies.
- A.4 The Association forbid all forms of bribery - meaning a financial or other advantage or inducement intended to persuade someone to perform improperly any function or activity. Staff must not offer, seek or accept bribes and must comply with the Association's Anti-Bribery Policy. Offering, seeking or accepting bribes will result in disciplinary action and may also result in criminal prosecution.
- A.5 Staff must report to their manager, Director or Chairperson any instances of suspected bribery within the organisation or any external organisation with which we have dealings.

### Personal benefit

- A.6 Staff, or someone closely connected to them cannot as a result of their role in the Association receive preferential treatment relating to any services provided by the organisation or its contractors/suppliers, and all staff should be able to demonstrate this
- A.7 Staff must not use, or seek to use their position to promote personal interests or those of any person with whom they are closely connected or the interests of any business or other organisation with which they have a connection.

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

## Resources, facilities and premises

A.8 Staff 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 I.T Policy gives further information including what is meant by 'reasonable personal use'.

A.9 Staff must comply with all of our relevant policies, including our I.T Policy in respect to usage of internet & email social media, also health & safety, equal opportunities and dignity at work.

A.10 Staff must not undertake work for another organisation - or for any personal business - on the Association's premises nor use our resources or facilities for such a purpose, unless you have specific permission from your Sectional Manager.

## Funds and expenses

A.11 Our funds must be safeguarded from abuse, theft or waste. Staff must at all times apply and observe all of our financial regulations and internal controls.

A.12 Staff must comply with our relevant policies when procuring goods/services or claiming expenses.

## Tenants/service users and money

A.13 As a general rule, in relation to tenants and service users staff 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.

A14 In circumstances where a staff member has declared family connection to a tenant/service user, common sense will be applied and the Association will not seek to impose restrictions on the private exchange of money between the staff member and that individual.

## General responsibilities

- A.15 Staff must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.

Staff 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.

- A.16 In presenting information staff must set out the facts and relevant issues truthfully.
- A.17 Staff must avoid any situation that could give rise to suspicion or suggest improper conduct.

- B. Openness and Accountability:** Staff must declare all relevant personal interests. Staff must handle information in accordance with our policies and procedures. Staff must report to the appropriate senior person within the Association any reasonable and honest suspicions they may have about possible wrongdoing.

### Declaring interests

- B.1 The Association must ensure that no conflict arises, or could reasonably be perceived to arise, between a staff member's duties and their personal interests, financial or otherwise. Staff must declare, and manage openly and appropriately, any actual or potential interests or conflicts.
- B.2 Where a staff member has personal, business or financial interests 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.
- B.3 Staff must keep their entry in the Register of Interests complete, accurate and up to date.

### Handling information

- B.4 Staff must observe and uphold the legal requirements and the Association's policies in respect of the storage and handling of information, including personal and financial information. The Association's Data Protection Policy gives further guidance.
- B.5 Staff 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.
- B.6 Staff must not use confidential information acquired through their work as one of our employees for your private interests or any other purpose for which it is not intended.

### Respecting confidentiality

- B.7 Staff must respect confidentiality and ensure that you do not disclose information to anyone who is not entitled to receive it, both whilst a member of staff and after they have left employment with the Association.

- B.8 Unless specifically authorised to do so, staff 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 the Association or our activities. If you are approached by the press or other media you must quickly pass the enquiry to the Director or in his absence your Sectional Manager.
- B.9 Staff must not publish any material or deliver any lecture or address any issues relating specifically to the Association or our activities without prior approval.

### Using social media

- B.10 We respect 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 us, our customers, partners, suppliers, board members, or employees on any social networking sites, bulletin boards, blogs or similar. (See also C11 under “Upholding our reputation”). This applies whether you are posting under your own name or a pseudonym.

### Reporting concerns

- B.11 If a staff member becomes aware of any actual or potential fraud, corruption or wrongdoing, or breaches of this Code they must immediately report this to your Sectional Manager, Finance & Corporate Services Manager or Director. If the matter relates to the Director the staff member is encouraged to report this to the Chairperson. Staff may do so on a confidential basis. The Association’s Policy on Dealing with Whistle-blowing Complaints gives further information.
- B.12 Staff must not victimise any person who has used - or intends to use, or is suspected of having used - our confidential reporting or whistleblowing procedures to report any actual or alleged fraud, corruption or wrongdoing by others.

- C. Selflessness, Objectivity and Leadership: Staff must act in the best interests of the 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 their own conduct.**

### Fulfilling your role

- C.1 Staff must comply with their terms and conditions of their appointment and our policies and procedures relating to their role.
- C.2 Staff must fulfil their duties responsibly, exercising reasonable skill and care and acting at all times in our best interests and that of our tenants and other customers.

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

- C.3 Staff must work to promote our aims and objectives 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 any staff member is in doubt as to the legal and regulatory requirements that are relevant to their role, they must seek guidance from their Sectional Manager.

- C.4 Staff must work at all times in accordance with our policies and procedures and not allow their own personal or political opinions to affect the way in which you carry out your duties. This does not impinge on their right to be an active citizen or, for example, to be an active trade unionist.
- C.5 Staff must take direction from their Sectional Managers, other senior managers and the governing body, and exercise responsibly any authority that comes with their role as a staff member.
- C.6 Staff must not seek to use informal channels to influence the governing body regarding decisions to be made about the conduct of the Association's business.

- C.7 Staff must consult their manager before taking on any outside work or any position (paid or unpaid) that will in any way impact on their role with the Association. Any such work or position must not interfere with their existing job or conflict with our interests. Appendix 1 gives more details on declaring interests.
- C.8 Staff must participate in any necessary training, and play an active part in our performance appraisal process. Staff will contribute to the identification of any personal training needs they may have in order to keep their professional skills and knowledge up to date.

### **Working with tenants and other service users**

- C.9 Staff must maintain high standards of professionalism, fairness and courtesy in all your dealings with tenants and other service users.
- C.10 Staff must not allow any personal relationship with a tenant or other service user to conflict with the conduct of their role and responsibilities.
- C.11 Staff must use the appropriate channels for handling tenancy and service provision issues. Staff must not act outside our established procedures in any matter concerning any tenant or other service user.

### **Upholding our reputation**

- C.12 Staff 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, governing body members, service users, partners and anyone that we are doing business with.

If staff have a grievance or concern relating to another member of staff or a member of the governing body or have any concern about potential wrongdoing they should discuss it with their Sectional Manager in the first instance or Director if it involves their Sectional Manager.

- C.13 Staff must always be a positive ambassador for the Association and our work, especially when attending events as a member of our staff or in dealing with outside bodies.

### **Showing respect for others**

- C.14 Staff must treat others with respect at all times. This includes considering the views of others and being tolerant of differences.

- C.15 Staff must adhere to both the letter and the spirit of our equality and diversity policy. See also A.18 above about the need to avoid discrimination of any kind.
- C.16 Staff must always conduct them self in a courteous and professional manner. Staff must not, by their actions or behaviour, cause distress, alarm or offence.
- C.17 Staff must at all times display a positive attitude to their work, colleagues and the Association
- C.18 Staff must not harass, bully or attempt to intimidate any person.
- C.19 Staff must take care when displaying materials in the office, and ensure that these would not reasonably cause offence to their colleagues. If in doubt, consult with their Sectional Manager before displaying any materials.
- C.20 When attending meetings, staff must be courteous to all attendees and respect the position of the meeting chair or convenor. Staff 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.

## Breach of the Code

As a member of staff there is 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 your Sectional Manager or the Director. In the case of the Director being the subject of a potential breach the staff member should bring this matter to the attention of the Chairperson.

Any material breach of the Code will be considered under our disciplinary procedures and may result in a disciplinary action being taken, 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 must sign the below statement of acceptance once you have read and understood this Code and its requirements.

## Statement of Acceptance

I \_\_\_\_\_ have read and understood the terms of this Code of Conduct and I agree to uphold its requirements in all my activities as a staff member of Cadder Housing Association.

I confirm that I am aware that I must declare and manage any personal interests in accordance with our policy. I agree to review all relevant Registers regularly to ensure that all entries relating to me are accurate.

I understand that, if I am found to have breached any points mentioned in this Code of Conduct or acted against its spirit, action will be taken in accordance with Cadder Housing Association's disciplinary procedures and could ultimately result in my dismissal.

Signed \_\_\_\_\_

Date \_\_\_\_\_

This Code of Conduct was adopted by the Governing Body on 24<sup>th</sup> August 2017. It will be reviewed not later than August 2020.

## Declaring and Managing Personal Interests

### 1. Introduction

- 1.1 Being a member of Cadder Housing Association's staff is of course only one part of your life. Other aspects of a staff member's life - such as family, friends and neighbours, voluntary work, causes they support, possibly business or financial interests, possibly their own housing arrangements - may have the potential to cross over into the role as a staff member.
- 1.2 However, as we are 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 the duties as a member of staff and your personal or financial interests.
- 1.3 Any potential conflict between a staff member's position and their other interests must be openly declared and effectively managed so as to protect the good reputation of Cadder Housing Association and the RSL sector.
- 1.4 As stated in the Code (provision B1), where a staff member has 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 they know that someone to whom they are closely connected has such an interest, they must declare it promptly and record it in the Register of Interests.
- 1.5 This Appendix gives further guidance on how to declare and manage any personal (including personal business or financial) interests.

### 2. Examples of interests that must be declared

- 2.1 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 staff members should also declare.
  - Tenancy of a property (by you or someone to whom you are closely connected) of which we are 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 us.
  - Receipt of care or support services from us.
  - Membership of a community or other voluntary organisation that is active in the area(s) we serve.

- Voluntary work with another RSL or with an organisation that does, or is likely to do, business with us.
- Membership of the governing body of another RSL.
- Being an elected member of any local authority where we are active.
- If you purchase goods or services from us.
- If you purchase goods or services from one of our approved contractors or Framework Agreement partners.
- Significant shareholding in a company that we do business with.
- Membership of a political, campaigning or other body whose interests and/or activities may affect our work or activities.
- Ownership of land or property in our 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 us.

2.2 Staff not sure whether a certain matter needs to be declared, must seek guidance from their Sectional Manager or from the Director. If doubt remains, the advice would always be to declare the matter.

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

### 3. Definition of 'close connection'

- 3.1 Someone 'closely connected' to staff member 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.
- 3.2 The following table outlines those who staff members should consider when declaring interests:

**Table A**

<b>Group 1 Members of your household</b>	<b>Group 2 People closely associated with you</b>	<b>Group 3 Others you need to consider</b>
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	<ul style="list-style-type: none"> <li>• Parents, parents-in-law and their partners</li> <li>• Sons and daughters; stepsons and step-daughters and their partners</li> <li>• Brothers and sisters and their partners</li> <li>• A partner's parent, child, brother or sister</li> <li>• Grandparents, grandchildren and their partners</li> <li>• Someone who is dependent on you or whom you are dependent on</li> <li>• Close friends</li> </ul>	<p>Other relatives (e.g. uncles, aunts, nephews &amp; their partners)</p> <p>Other friends (e.g. someone you are acquainted with socially, neighbours, business contacts/associates)</p>

- 3.3 Staff becoming aware of any action or involvement relating to **anyone** in the table should declare and manage this as soon as possible.
- 3.4 However, we recognise that staff will not always be closely acquainted with or in regular contact with all of the people listed and we do not expect them to go to unreasonable lengths to identify actions or involvement that are covered by this policy.

- 3.5 Please note, we do expect staff to be familiar with the actions of members of their 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 they must take steps to identify, declare and manage these.
- 3.6 **Staff are not expected to be aware of the actions of people in groups 2 and 3 that they do not have a close association and/or regular contact with.** We do not expect you to research into the employment, business interests and other activities of all persons with whom you are closely connected.
- 3.7 In relation to 3.3 – 3.6 above, Staff when considering their actions should do so from the point of view of a reasonable and objective observer.

#### 4. Declaring personal interests

- 4.1 Staff are required on appointment, to complete a form to register any personal interests that could potentially conflict with their role and update this form whenever there is a material change.
- 4.2 As stated in the Code (provision B2), Staff must 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.
- 4.3 A situation may arise where a staff member is invited to be present at a meeting where a matter in which they have a personal (or a personal business or financial) interest is discussed. In such cases staff must inform the meeting chairperson at the start of the meeting, or as soon as you become aware that this is the case. The staff member would then be required to leave the meeting for the duration of the particular item. If in any doubt staff should ask the meeting chairperson or another senior person present for guidance. This applies to all meetings that you attend as a member of our staff – both internal and external.
- 4.5 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.