

BLAIRTUMMOCK HOUSING ASSOCIATION

CODE OF CONDUCT MODEL POLICY FOR RSL STAFF

Title: Code of Conduct Model Policy for RSL Staff

Purpose of procedure: To ensure staff carry out duties in accordance with the Association's Policies and Procedures

Section:

Date: October 2020

Review date: October 2023

Regulatory Standard: 5.2 - The RSL upholds and promotes the standards of behaviour and conduct it expects of governing body members and staff through an appropriate code of conduct. It manages governing body members' performance, ensures compliance and has a robust system to deal with any breach of the code.

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1. INTRODUCTION

This Code of Conduct applies to all employees of **Blairtummock Housing Association**. It is also expected that all customers, suppliers, partners of **Blairtummock Housing Association** and anyone dealing with us will respect and follow principles underpinning this Code.

Blairtummock Housing Association is committed to maintaining high standards of conduct in all areas of its activities. It relies on all its employees to observe these high standards in relation to the affairs of the Organisation and its relationship with clients, suppliers, employees, board members, advisors and the communities in which it operates.

No code of conduct can hope to spell out the appropriate behaviour for every situation nor should it seek to do so. Instead, the main objective of the Code is to alert you to the areas which are of particular importance to you as an employee. It should be noted that this may include conduct likely to bring **Blairtummock Housing Association** into disrepute or undermine its managerial integrities. This includes conduct taking place outside of the immediate normal working environment e.g. Christmas parties or other social events.

In the final analysis, **Blairtummock Housing Association** relies on each of its employee to make a judgement on what is right and proper in any particular situation.

The following may help you decide how to act when faced with a difficult decision: -

- Is anyone's life, health or safety endangered by my action?
- Does my action 'feel' right? Does it meet my personal code of behaviour? Could I justify my action to a customer, committee member, or close colleague?
- Is my action legal, and does it comply with **Blairtummock Housing Association's** policy and approved practice?
- Does my intended action appear reasonable? Would I be

able to justify it to the local news media?

- Would I be compromised if my intended action became known to colleagues at **Blairtummock Housing Association**, my manager, family or friends?
- Do I get an extra benefit as a result of my actions?
- Is the motivation for my action the best interest of **Blairtummock Housing Association**?

Ethical dilemmas occur in many aspects of business life. In order to operate this Code of Conduct effectively, the following should be in place:

- **Blairtummock Housing Association** should maintain a register of interests of individual staff members, which discloses, at a minimum, their (other) employment, positions of public responsibility, membership of any other related organisation and any financial interests which may relate to the work of **Blairtummock Housing Association**;
- a policy on expenses for staff;
- a register for recording any gifts or hospitality offered or received.

- **The principles**

The following **principles** underpin this Code of Conduct, and should help staff decide whether their actions are compliant:

- **Selflessness** - you should act in the best interest of **Blairtummock Housing Association** at all times and take decisions that support and promote our strategic plan, aims and objectives. You should not take decisions to gain financial or other material benefit for yourself, your family or friends.
- **Integrity** - you should *actively support and promote our values; not be influenced by personal interest in exercising your role and responsibilities*. You should also avoid having

any (financial or other) obligations to outside individuals or organisations that might influence you in relation to ***Blairtummock Housing Association***.

- *Objectivity* - you should *consider all matters on their merits and must base your decisions on the information and advice available and reach your decision independently in terms of* delivery of services, the selection of staff and awarding of contracts.
- *Accountability* -you must accept accountability for your decisions and actions and submit yourself to whatever scrutiny is appropriate internally and/or by external bodies and stakeholders.
- *Openness* - you should be *transparent in all of your actions: you must declare and record all relevant personal and business interests and must be able to explain your actions.* You should only restrict information when individual or commercial confidentiality clearly so demands.
- *Honesty* -you must declare any private interest relating to your duties, and take steps to resolve any conflicts arising in a way that is lawful and protects the reputation values and mission of ***Blairtummock Housing Association***.
- *Leadership* - you must support and promote our principles and commitment to delivering good service to our customers; and lead by example.

- **Dealing with breaches**

Where employees breach this Code then such matters will fall to be considered under the organisation's disciplinary processes.

- **Roles and responsibilities**

The board and senior official(s) should ensure a clear understanding of their respective roles in relation to maintaining

standards amongst employees. Such arrangements will vary according to organisational size and status (e.g. charitable/non charitable, differing/multiple regulatory body's expectations).

2. GENERAL CONDUCT

You are expected to carry out your duties in accordance with ***Blairtummock Housing Association*** policies and procedures.

High standards of personal conduct are expected of all employees at all times. You should show courtesy, efficiency, reliability, respect, sobriety and punctuality.

3. PROPERTY

All property belonging to ***Blairtummock Housing Association*** can only be used for business purposes unless explicit consent is given. This includes physical property, the business premises and intellectual property.

All property of ***Blairtummock Housing Association*** that you use or are responsible for must be used carefully and must be protected and stored in a safe place when not in use. It must also be only used for ***Blairtummock Housing Association's*** benefit and in the way that it is intended. It should not be used for the benefit of individual employee unless explicit consent has been sought and given by the appropriate manager.

Any confidential documents should be securely locked away when left unattended and properly disposed of when necessary in accordance with the ***Blairtummock Housing Association's*** data protection and document retention policies.

You may be involved in the preparation of memoranda, notes, lists, records and other documents. You will also have similar documents made available to you. Where these concern the business of ***Blairtummock Housing Association***, or any of its associated partners, these are regarded as business property of ***Blairtummock Housing Association***. You must, therefore, promptly return all such documents to the organisation when you are no longer employed by ***Blairtummock Housing Association***. You are also not allowed to disclose or discuss their contents.

You are only allowed to remove ***Blairtummock Housing Association's*** property from its business premises with prior approval from the appropriate manager.

- **Private telephone calls/faxes/e-mails**

The controlled use of official telephone lines for private use is allowed within reason. All non local use must be advised in advance and paid on receipt of an itemised telephone bill.

- **Use of company mobile phones**

Staff issued with company mobile phones must ensure the security of the phone (and any allied equipment) at all times. Personal (non-business) calls should be avoided and where necessary should be very short.

Health & Safety rules regarding the usage of mobile phones must be observed at all times. Under no circumstances should mobile phones be used while driving or while using machinery.

Mobile phones should be switched off during meetings, seminars, training courses etc. other than in very exceptional circumstances where it is necessary to take an urgent business call. In these circumstances it is courteous to alert colleagues to the fact that an urgent call is expected.

Business calls from land lines to mobile phones should be kept to a minimum due to the increased cost.

- **Use of official premises**

Employees may not use official premises for unofficial purposes at any time without the prior approval of the appropriate manager.

- **Other employment/activities**

Employees may not accept a post or undertake any occupation or activity which would require their attendance at any time during office hours and/or prejudice the proper performance of their duties for the organisation. In exceptional circumstances, permission may be granted by the Management Committee for such activities. This permission should therefore be sought in advance and in any case where the employee is in doubt as to whether this condition would apply.

4. DEALING WITH INFORMATION

When handling information, there should be a balance between openness and confidentiality. It is a requirement that certain information is available to members, auditors, and the Regulator(s). You should be aware of these requirements and act accordingly.

- **Disclosure of information**

In the course of your involvement with ***Blairtummock Housing Association*** you may have access to confidential information about our business, customers, partners, fellow board members/employees and of other organisations. It is forbidden to disclose such information to another party, without first obtaining the written permission of the management committee.

Examples of confidential information include:

- information relating to specific individuals or their financial affairs, including customers, employees and board members
- details of contracts for the supply of goods or services
- financial statements and business projections
- information concerning the terms of negotiations relating to the acquisition or disposal of property
- marketing plans or strategies,
- new business developments or plans,
- business acquisition plans,
- plans to employ new personnel,
- information concerning labour relations, consultations or negotiations with staff,
- information concerning legal proceedings
- items specifically marked "confidential"
- software and computer programmes.

It is your duty to keep all such information confidential. This obligation applies both during the time you are associated with ***Blairtummock Housing Association*** and also after your employment ceases.

The permission of the director is also required before confidential correspondence or documents are removed from the work premises.

- **Social networking**

We respect your right to a private life and that includes joining any social sites you wish. However, information posted on such sites is classed as public and not private. You are therefore not allowed to disclose confidential information relating to **Blairtummock Housing Association**, its customers, partners, suppliers, board members, employees, etc; on any social networking sites. It is also prohibited to post any comments on people and events connected to **Blairtummock Housing Association**, or make any remarks which could potentially bring **Blairtummock Housing Association** into disrepute. Any such actions could result in disciplinary action, including dismissal.

- **Public statements**

Blairtummock Housing Association has a policy on handling media inquiries and employees must comply with it. You are not allowed to publish any material or deliver any lecture or address issues relating specifically to **Blairtummock Housing Association** or its business without prior approval. This approval should be requested and given in writing by the executive management committee or appropriate sub committee. However, for guidance, you must be aware that your comments on issues which are subject to debate must be limited to professional advice, fact, legal and financial implications. This does not circumscribe your duties and responsibilities but aims to prevent you being considered to be a participant, or biased, in campaigns or politics, which directly affect **Blairtummock Housing Association**.

5. FINANCIAL CONDUCT

You must ensure that you:

- Use funds and resources for the purposes intended, and in a responsible and lawful manner.

- Safeguard them from abuse, theft or waste.
- Strive for value for money.
- Apply and observe the organisation's financial regulations, and internal controls.

Staff are expected to report any breaches of this code. In exceptional circumstances, where there is real danger of reprisal, anonymity can be granted to those reporting fraud, theft, any other illegal activities, etc.

- **Theft / fraud**

Although we strive to meet the highest ethical standards, we recognise that, like any other business, **Blairtummock Housing Association** risks financial and organisational loss due to fraud. It may damage the service we provide and our reputation with customers, partners, public and the regulators. **Blairtummock Housing Association** has a responsibility to protect its assets, reputation and the public funds it receives. **Blairtummock Housing Association** is fully committed to the prevention, detection and reporting of fraud, theft and corruption; and the recovery of assets.

- **Bribery**

Blairtummock Housing Association forbids all forms of bribery, meaning a financial or other advantage intended to persuade someone to perform improperly any function or activity. You are not allowed to accept or give bribes from/to anyone with whom **Blairtummock Housing Association** does business. You are also obliged to report any instances of suspected bribery within either **Blairtummock Housing Association** or any of its business partners. Accepting or giving bribes will result in disciplinary action including dismissal and can also result in criminal prosecution and imprisonment of up to 10 years for individuals found guilty of such acts.

All staff have a duty to immediately report any act of attempted, suspected or detected fraud, theft, bribery and corruption. This can be done in a confidential manner to an appropriate person, for example: a senior officer, the chair, a board member, the audit committee or the company solicitor.

6. TENDERING AND PURCHASING

Blairtummock Housing Association endeavours to process all tendering and purchasing activities in a transparent and impartial way. All orders and contracts must be awarded on merit and by fair competition.

Blairtummock Housing Association is a non-profit making body that is responsible for large amounts of public money and for publicly or charitably funded assets. It is therefore necessary to ensure that those responsible for the management and administration of ***Blairtummock Housing Association's*** business are seen to make a clear distinction between their own personal affairs and those of ***Blairtummock Housing Association***.

In this light it will be the norm that no individual staff member will have any involvement in any contract with any business in which they (or a close relative) have a commercial interest or in which they (or a close relative) are directly concerned in the management of. In exceptional cases where such relationship exists for staff' relatives, ***Blairtummock Housing Association*** may still enter into business arrangements; but in these cases the individuals concerned must have no part in any aspect of the tendering, letting or management of any such contract or piece of business.

In all situations employees must not disclose confidential information on any tender details, and where possible, and where alternatives exist, should avoid the use for private purposes of any

firms working for ***Blairtummock Housing Association***. The above provisions do not apply to chain stores such as Argos or Comet. However if ***Blairtummock Housing Association*** has a special arrangement with the company you must not take advantage of this arrangement for personal purposes, e.g. receive a discount.

7. RELATIONSHIPS

It is expected that employees treat each other and their colleagues with mutual respect. Close personal familiarity could be prejudicial to the good running of the organisation, and should be avoided.

Employees should not use informal channels to influence the committee on the company business. They should also not make decisions or seek to influence decisions that could benefit someone closely connected to them. A person closely connected includes family members e.g. a spouse or partner; parent; parent-in-law; son; daughter; stepson; stepdaughter; partner's child; brother; sister; brother or sister of partner; grandparent; grandchild; uncle; aunt; nephew; niece; the partners of any of these people and any dependents; and anyone on whom the employee depends. This would also include any persons who the employee has a close association with but has no relation by birth or law; who, it might reasonably be perceived by the general public, that the employee would be prepared to favour or disadvantage. This could refer to anyone with whom the employee is in regular contact e.g. a friend, colleague, neighbour, business contact/associate or someone known to the member socially.

If you find that your friendship or close relationship, or affair may cast doubt on the objectivity of your decision-making, you should advise your line manager. This is to prevent you leaving yourself open to allegations of bias or favouritism. Individuals can discuss in confidence their own situation with the Employee Counselling Service on 0800 435 768.

- **Conflict of interest**

Employees must ensure that their private or personal interests do not influence decisions and that they do not use their position to obtain personal gain of any sort, either for themselves directly, or for their families, friends or associates.

Examples of such situations could be if you are conducting business on behalf of ***Blairtummock Housing Association*** with a business with which you or a person closely connected to you is associated; or you/they are working for an organisation which is either a frequent partner of ***Blairtummock Housing Association*** or a competitor to its partner(s).

Employees must declare any actual or potential conflicts of interest arising from previous sections of this code in **Blairtummock Housing Association's** register of interests. A normal procedure will be that the person making such declaration is not allowed to deal with a specific aspect of **Blairtummock Housing Association's** business that creates the conflict.

- **Contractors, suppliers, consultants**

All current and past, private or business, relationships with current, or potential contractors (etc) should be declared to the relevant line manager; whether you are involved in their appointment or not.

- **Access to *Blairtummock Housing Association's* services**

Blairtummock Housing Association's primary purpose is...*elaborate here about your business purpose and highlight that staff are not allowed to take advantage of their position to gain these benefits for themselves and their friends/family.*

*e.g.: Employees are not eligible to receive charitable grants or loans from **Blairtummock Housing Association**, nor from any charitable funds administered by Blairtummock Housing Association by us.*

8. EQUALITY

You should ensure that **Blairtummock Housing Association's** policies are complied with both in the letter and in the spirit ***Blairtummock Housing Association*** Equality and Diversity policy.

9. EMPLOYMENT MATTERS

Staff involved in making appointments should ensure that these are based on merit alone.

Personal preferences should not influence any judgements that you make whilst acting on behalf of ***Blairtummock Housing Association***.

The law and ***Blairtummock Housing Association's*** current recruitment and selection procedures must be thoroughly observed, and decisions made must be transparent and impartial.

All recruitment and selection procedures and decisions must also comply with Blairtummock Housing Association's Equality and Diversity Policy.

Blairtummock Housing Association is conscious of the potential equality and fraud risks associated with the employment of close relatives of existing board members and expressly prohibits this. It may however consider the possibility of employing close relatives of former board members. Where this latter scenario is considered there will normally be an exclusion period of 12 months applying to such arrangements and where this is not so it will generally be expected good practice for the Board to be aware of any such appointments, to approve these and to make a confirmatory entry in a suitable register (some organisations e.g. those not covered by any of the main Regulators may not prohibit/restrict such appointments at all).

In any event it would also be expected that the following would apply:

- There has been a rigorous, fair and competitive recruitment process
- Close relatives are not employed in the same department as their relative (or one works in a different location to the other), and there is no line management responsibility
- There is a low risk of complicity between the two posts
- There is a low risk of management problems arising from the employment of the relative.

In all cases though, if you become involved in a personal relationship with an existing board or staff member, you must declare this to your line manager at the point that it is considered serious, e.g. you are co-habiting. **Blairtummock Housing Association** reserves the right to review your role/job descriptions at this point to ensure suitable segregation of duties and controls exist in line with **Blairtummock Housing**

Association's policy on personal relationships at work.

10. OUTSIDE ACTIVITIES

As a good employer, **Blairtummock Housing Association** has no wish to interfere in the private lives of its employees. However, there are occasions where your outside activities can affect the interests of **Blairtummock Housing Association**. In all circumstances no paid or outside work should be undertaken at your place of work, or require the use of office facilities. This applies to any voluntary or unpaid work. You should inform your line manager of any possible conflict and seek necessary written permission to continue with the activity. If the outside activities will overlap with your commitments with **Blairtummock Housing Association**, do not commence until written permission has been granted.

- **Political, campaigning and public activities**

It is crucial that employees of **Blairtummock Housing Association** carry out their work without any bias towards any political or other group.

You must follow the expressed policies and procedures of the **Blairtummock Housing Association**, and must not allow your own personal or political opinions to interfere with your role within **Blairtummock Housing Association**.

None of the above impinges on your rights to be an active citizen or, for example, an active trade unionist or acting in such capacity.

11. GIFTS AND HOSPITALITY

Employees should not accept or offer any gift, favour or hospitality which is intended as, or might be deemed by others to have the effect of an inducement. It is normally clear whether an offer of hospitality etc. from another party might be considered excessive

or unreasonable. However, if there is any doubt contact your line manager. You must be aware that it is a criminal and a disciplinary offence to corruptly receive or give any gift, loan, fee, reward or other advantage in return for doing (or not doing) anything, or showing favour (or disfavour) to any person or organisation.

From time to time, as a courtesy to outside organisations with whom **Blairtummock Housing Association** works, you may wish to provide lunch or other minor hospitality to or accept entertainment from such people or bodies. This should not be common practice within a *not-for-profit / publicly funded charitable organisation*, as anything other than occasional entertainment can give rise to justifiable concern and suspicion. You should never solicit hospitality from another individual or organisation and should avoid extravagance of any kind in hospitality or entertainment, whether it is given or received.

Blairtummock Housing Association may occasionally spend a reasonable amount of money to provide hospitality to its employees, e.g. Christmas parties. A reasonable amount would be defined in accordance with an appropriate policy, it will be recorded in financial records and declared to the governing body.

If you wish to provide minor hospitality for someone outside **Blairtummock Housing Association**, you may do so with the approval of a principal officer.

12. General Data Protection Regulations

The organisation will treat your personal data in line with our obligations under the current data protection regulations and our own policy [insert name of policy or procedure]. Information regarding how your data will be used and the basis for processing your data is provided in [Blairtummock Housing Association's] employee privacy notice.

I hereby confirm I have read and agree to abide by
BLAIRTUMMOCK HOUSING ASSOCIATION'S Code of Conduct.

Name: _____

Signed: _____

Date: _____

Appendix 1

Declaration form

This form is to record any actual or potential conflict in interest arising under the code of Conduct. Please use a separate form for each conflict that you need to declare. Leave blank any boxes that are not relevant to the declaration. Please add any other relevant information on another sheet of paper which should also be signed and dated. (Note that in some organisations employees may be asked to sign such a declaration on an annual basis).

Your details

- 1 Name _____
- 2 Job Title _____
- 3 Date of Declaration _____

Details of the Declaration	
4 Please give details of who this declaration concerns - you, a family member, friend or associate?	
5 Please give details of any firm or business involved	
6 Please give details of any payment, benefit, transaction, contract, property, gift or hospitality that is involved (with date)	

7 Please give details of any proposed job application or other employment issue which may represent a conflict.

8 Is there any reason why this declaration should be regarded as confidential? Please give details.

Signed (employee):

Signed (manager):