



POLICY DOCUMENT

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Service Area: Governance

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Introduction

Good governance requires that organisations adopt and ensure compliance with a code of conduct to uphold the highest standards of probity and conduct. The Group code has been adapted from the National Housing Federation’s model code, incorporating the five values that underpin who we are and what we do. Our code represents a summary of the principles and standards of conduct that we expect of all non-executive directors, employees and involved customers. Compliance with this code demonstrates our daily commitment to the Group’s values to achieve the Group’s vision of:

Having a positive impact on people and communities by providing high quality homes, supporting independence and creating opportunities

Our values

We are people-focused

People are at the heart of our business. By treating everyone fairly and understanding their diverse needs and strengths, we can serve them better and provide services that positively impact their lives.

We are forward-thinking

We search for solutions and ideas that overcome the challenges faced by our customers, customers, communities and partners.

We are genuine

We are open and honest, with a friendly, enthusiastic and energetic way of working that is true to what we stand for.

We are expert

We lead the way through our knowledge and expertise, investing for a strong future and excelling in all we do to provide the highest possible standards of service.

We are collaborative

We work in partnership with our customers, customers, colleagues, local communities and other experts, to bring everyone together and achieve more.

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Code of conduct

While your conduct is expected to reflect the Group's values, this code goes further by setting out agreed, effective and specific requirements of anyone directly involved in delivering the Group's Strategic Plan and Business Priorities . It will ensure that we engage with each other in a professional manner, with dignity and respect, demonstrating integrity and avoiding any suggestion of influence by biased or improper motives.

These principles apply to work or activity undertaken directly for or on behalf of the Group, together with any personal or private activity or interest that could have the potential to bring the Group into disrepute.

Except where otherwise indicated, the code applies equally to all members of our boards and committees, staff and involved customers for Progress Housing Group Limited and its subsidiary companies, including Progress Housing Association Limited, Key Unlocking Futures Limited and Concert Living Limited.

A copy of the code will be made available to all staff, non-executive directors, trustees and involved customers. You must familiarise yourself with the contents and act in accordance with its principles and provisions at all times. Breaches of the code are always taken seriously. Failure to comply with the code may be an employment or governance disciplinary matter. The code cannot cover every situation you may face in your everyday role with the Group. You may find yourself faced with difficult situations or an unexpected dilemma. If anyone has any doubts or questions regarding the application of the code, or in relation to a specific issue, they should seek advice and guidance from the Governance Team.

The code is consistent with the seven principles of public life (see appendix 1). Although housing associations are not public bodies, the provision of social housing is a public function and the Group recognises the need to uphold the same values of selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

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Associated policies and procedures

The code of conduct should be read in conjunction with the Group's policies and procedures which are relevant to your role, including:

- Health and Safety Policy
- Standing Orders and Scheme of Delegation
- Financial Regulations
- Procurement Policy
- Human resources policies
- Data Protection Policy
- Media and Social Media Policy
- Equality, Diversity and Inclusion Policy
- IT policies
- Raising Concerns at Work Policy
- Anti-fraud, Anti-money Laundering and Anti-bribery Policy

Further guidance on procedures that support this code of conduct are provided in a separate document (Code of Conduct Procedures).

Breach of the code

If you believe there has been a breach of the code you should report the breach to the appropriate party. Alternatively, you can report a breach under the Group's Sharing Concerns at Work Policy or to the Company Secretary. Where you are in doubt about a possible breach of the code, you are encouraged to report your concerns or seek advice. Anyone who has concerns about misconduct, and reports this in good faith, will have nothing to fear and will be supported by the Group.

Should you have any questions about or require any help or assistance with the provisions of this code and associated guidance please contact the Governance Team.

Equality Impact Assessment

The Equality Impact Assessment has designated the impact as low risk. The Group does not believe that this policy has an adverse impact on any protected characteristic, however we welcome feedback on the procedures and the way it operates. We are interested to know any possible or actual adverse impact that this policy may have on groups in respect of gender, marital status, race, disability, sexual orientation, religion or belief, age or other characteristic.

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The main principles of the code

A. General responsibilities: You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of the Group, its customers and other service users.

B. Conflicts of interests: You must take all reasonable steps to ensure that no undeclared conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise.

C. Bribery, gifts and hospitality: You must not offer, seek or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity, or place you under an obligation to those individuals or organisations.

D. Funds and resources: You must not misuse the Group's funds or resources.

E. Confidentiality: You must handle information in accordance with the law and the Group's policies and procedures.

F. Respect for others: You must treat others with respect at all times.

G. Relationship between non-executive directors, trustees, staff and involved customers: Non-executive directors, trustees, staff and involved customers must maintain a constructive, professional relationship based on a sound understanding of their respective roles.

H. Relationship with customers and other service users: You must maintain high standards of professionalism, fairness and courtesy in all your dealings with customers and other service users.

I. Health, safety and security: Your conduct must not endanger the health, safety or security of yourself or others.

J. Conduct at meetings: Your conduct at board and other meetings must meet a high standard of integrity, commitment and courtesy.

K. Representing the Group: In representing the Group at external events and in dealings with outside bodies, you must uphold and promote the Group's values, objectives and policies.

L. Learning and development: In partnership with the Group, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

M. Reporting concerns: You must report any reasonable and honest suspicions you may have about possible wrongdoing.

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A. General Responsibilities

Main principle

You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of the Group, its customers and other service users.

Provisions

A1. You must comply with the law, your terms of appointment and the Group's policies and procedures relating to your role.

A2. You must not conduct yourself in a manner which could reasonably be regarded as bringing the Group into disrepute. This includes membership of, or participation in, activities organised by groups or organisations whose values are inconsistent with the Group's (for instance, racist organisations), which could create reasonable doubt in your ability to comply with the Group's values and this code.

A3. You must not bring the Group's name into disrepute or affect its integrity by your actions or words, either within the organisation or outside. This includes the use of, or entries on, social networking sites (such as Facebook, Twitter, YouTube, etc.). This includes making derogatory comments about the Group, its customers or other service users, partners or services, either in person or in writing or via any web-based media such as a personal blog or other site. This also applies if you do not name the Group but where its identity can reasonably be inferred, or where you use a pseudonym but your identity can reasonably be inferred. If you have a genuine concern about possible wrongdoing, you must report it to the appropriate senior person within the organisation (see section M).

A4. You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.

A5. You must respect the appropriate channels for handling tenancy and service provision issues. You must not act outside the Group's established procedures in any matter concerning any resident or other service user.

A6. You must not misuse your position, for example, by using information acquired in the course of your duties, for your private interests or those of others.

A7. You must respect the principle of collective decision-making and corporate responsibility. This means that once the board has made a decision you must support that decision.

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Political campaigning

A8. You must not engage in any political or campaigning activity that might compromise the position of the Group. Non-executive directors, trustees or involved customers intending to stand for political office must discuss the matter with their chair, and members of staff with their line manager.

Non-Executive Directors

A9. If you take up new employment or appointments during your term of office on the board, you must make any necessary declaration of interest. Any such work or position must not interfere with your role as a non-executive director.

Staff members

A10. You must consult your manager before taking on any outside work or any position, paid or unpaid. Any such work or position must not interfere with your existing job or conflict with the interests of your job or the Group.

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B. Conflict of Interest

Main principle

You must take all reasonable steps to ensure that no undeclared conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise.

Provisions

B1. You must comply with the Group's policies and procedures for declaring, recording and handling conflicts of interest. Amongst other things, these require you to declare any private interests which may, or may be perceived to, conflict with the duties of your role.

B2. You must ensure that your entry in the Group's declaration of interests register is complete, accurate and up-to-date.

B3. You must comply with the Group's policies and procedures relating to the application for employment or housing from members of staff, non-executive directors, involved customers or others to whom they are related or closely connected.

B4. You must not be involved in the appointment of staff where you are related, or are closely connected, to an applicant. You must declare any such relationship to the appropriate person. You must not be involved in decisions relating to discipline, promotion, pay or benefits for any member of staff to whom you are related or closely connected.

B5. You must not be involved in the appointment of a contractor or supplier where you are related, or closely connected, to an organisation or individual applying or tendering for, a contract. You must declare any such relationship to the appropriate person and ensure that you have updated your declaration of interest. You must not be involved in establishing the terms of a contract, or its ongoing monitoring and management, where you are related, or closely connected, to the contractor or supplier.

B6. Except where specifically permitted, you must normally avoid using the Group's contractors and suppliers for private purposes. Where this is unavoidable, you must not receive a favourable service as a result of your connection with the Group. Prior approval must be sought before using the supplier or contractor and a written declaration made confirming that no financial or other advantage has been secured by you and the contractor as a result of the relationship with the Group.

B7. You must not use, or attempt to use, your position to promote your personal interests or those of any connected person, business or other organisation.

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C. Bribery, gifts and hospitality

Main principle

You must not offer, seek or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisations.

Provisions

C1. You must comply with the law and the Group's policies and procedures in relation to:

- 1) bribery and corruption; and
- 2) the giving, receipt, approval and recording of gifts and hospitality.

C2. You must not canvass or seek gifts or hospitality or other benefits.

C3. If you are offered gifts or hospitality, they should either be declined, or prior approval sought for their acceptance. The only exceptions are gifts of token value or modest hospitality given in connection with normal work meetings. The Group's Code of Conduct procedures give further guidance.

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D. Funds and Resources

Main principle

You must not commit fraud through the misuse the Group's funds or resources.

Provisions

D1. You must comply with the Group's policies and procedures regarding the use of its funds and resources. 'Resources' includes staff, information, telephone, computer and other IT facilities, equipment, stationery and transport.

D2. You must ensure that the organisational funds and resources entrusted to you are used efficiently, economically and effectively.

D3. You must comply with the Group's policies and procedures regarding procurement ensuring value for money and fairness in decision-making.

D4. You must take reasonable measures to protect the Group's funds, resources, property and assets from theft, damage and misuse.

D5. You must comply with the Group's policies and procedures relating to the acceptable or unacceptable use of email, intranet and internet services. Amongst other things, these policies and procedures prohibit access to pornographic or racist material, and the use of unauthorised or unlicensed software.

D6. You must claim reimbursement only for expenditure that was properly and reasonably incurred in carrying out the Group's business. You must ensure that any expenses claim you make is accurate and complies with the Group's policies and procedures.

D7. You must comply with the provisions of s.122 of the Housing and Regeneration Act 2008 (see appendix 2) which restricts the making of gifts and payment of dividends and bonuses to members of the Group's boards or committees.

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E. Confidentiality

Main principle

You must handle information in accordance with the law and the Group's policies and procedures.

Provisions

E1. You must comply with the provisions of the current enforceable data protection legislation, which governs the protection of personal data. All personal data held about customers and other service users, employees and others, whether on paper or electronically is subject to the provisions of the legislation. The Group's policies and procedures give further guidance.

E2. You must not disclose without authority any confidential business information. This duty continues to apply after you have left the Group or relinquished your position. Reference to this obligation can be found:

- 1) for staff, in your employment contract and related policies
- 2) for non-executive directors and trustees, in your service agreements; and
- 3) for involved customers, in your signed confidentiality declaration.

E3. You must not, without permission, pass or distribute to the press or media or any other external recipient(s) information or materials relating to the Group.

E4. In your capacity as a board or staff member or involved tenant, you must not, without prior authority:

- 1) appear to represent the views or position of the Group
- 2) write letters to the press or other recipients
- 3) write media articles, blog posts or tweets, etc., about the Group and its activities
- 4) make comments or statements to the media – if approached you must pass the enquiry to the appropriate person.

E5. You must not prevent another person from gaining access to information to which they are entitled by law.

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F. Respect for others

Main principle

You must treat others with respect at all times.

Provisions

F1. You must comply with the law and with the Group's policies and procedures relating to equality and diversity. Equality laws prohibit discrimination on grounds including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The law imposes positive duties to eliminate unlawful discrimination and promote equality. The Group's Equality, Diversity and Inclusion Policy gives further guidance.

F2. You must not harass, bully or attempt to intimidate any person. The Group's Dignity at Work and Equality, Diversity and Inclusion policies give further guidance.

F3. You must not display materials in the workplace which other people might reasonably find offensive or use language which board members, work colleagues or customers might reasonably find offensive.

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G. Relationship between staff, non-executive directors, trustees and involved customers

Main principle

Non-executive directors, trustees, staff and involved customers must maintain a constructive, professional relationship based on a sound understanding of their respective roles.

Provisions

Non-executive directors and trustees

G1. You have a duty of loyalty and support towards the Group and this must be reflected in a constructive, professional relationship with its staff.

G2. You must not go beyond your role and become inappropriately involved in operational matters.

G3. In your dealings with staff, formally and informally, you must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies and objectives of the Group.

Non-executive directors, trustees and involved customers

G4. Where it is necessary to raise issues of poor staff performance at a formal meeting, these must be raised in a constructive way, aimed at getting things right in future, and not at criticising individuals. Any concerns about the performance of individuals must be discussed in confidence with the chair of the board, committee or panel or with the Group Chief Executive.

G5. You must not appear to undermine the authority of a senior officer in his or her dealings with a more junior member of staff.

G6. You must avoid inappropriate personal familiarity with members of staff.

G7. You must not ask or encourage a member of staff to act in any way which would conflict with compliance with this code or the Group's policies and procedures.

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Involved customers

G8. You must not seek to instruct or direct a member of staff or contractor. The relevant manager or member of staff must convey all instructions.

Staff members

G9. If your work brings you into contact with the board, a committee or a customers' committee or panel, you must:

- 1) take direction from the board, or in accordance with any delegated authority of a committee or panel
- 2) respond constructively to questioning or challenge
- 3) respond willingly to requests for information.

G10. You must avoid inappropriate personal familiarity with non-executive directors, trustees and involved customers.

G11. You must not use informal channels to lobby or influence non-executive directors, trustees or involved customers on matters of the Group's business.

G12. You must not knowingly mislead the board or any of the Group's committees or panels. In presenting information you must set out the facts and relevant issues truthfully.

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H. Relationships with customers and other service users

Main principle

You must maintain high standards of professionalism, fairness and courtesy in all your dealings with customers and other service users.

Provisions

H1. You must treat all customers and other service users with courtesy and respect.

H2. You must not allow any personal relationship with a tenant or other service user to conflict with your role and responsibilities.

H3. You must not give personal gifts or loans of money to, or receive loans or gifts of money from, customers or other service users.

H4. You must take great care in handling customers' and other service users' money, ensuring that a receipt is completed for every transaction.

H5. You must not invite or influence a tenant or other service user to make a will or trust under which you are named as executor, trustee or beneficiary.

H6. When handling information relating to customers and other service users, you must comply with the law and the Group's policies and procedures relating to the protection of personal data.

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I. Health, safety and security

Main principle

Your conduct must not endanger the health, safety, wellbeing or security of yourself or others.

Provisions

I1. You must comply with the Group's health and safety and human resources policies, procedures and guidance and bring to the attention of the appropriate person any risks to yourself or others. In particular:

- 1) where you are provided with protective equipment or clothing this must be worn
- 2) for your own safety, you must comply with the Group's lone working policy and procedures relating to lone working/personal safety
- 3) you must participate in the health surveillance programme, where applicable to your role.

I2. You must comply with the law and the Group's Smoke Free and Alcohol and Substance Abuse policies.

I3. You must comply with the Group's processes relating to the security of premises.

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J. Conduct at meetings

Main principle

Your conduct at meetings must show respect for all, and comply with the Group's standards.

Provisions

J1. You must respect the position of the meeting chair, including sending apologies to the chair, or an appropriate officer, if you cannot attend or will be arriving late.

J2. You must be courteous to all other attendees by listening to all points of view and avoiding interruptions when another person is talking.

J3. You must not use threatening or aggressive behaviour or language, or act in a disruptive way.

J4. You must not attend meetings while intoxicated or under the influence of drugs.

J5. Once a board, committee or panel meeting has properly reached a decision, you must share responsibility for that decision, even where you had not supported it.

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K. Representing the Group

Main principle

In representing the Group at external events and in dealings with outside bodies, you are an ambassador for the Group and must uphold and promote its values, objectives and policies.

Provisions

K1. You must not become involved in, or be seen to endorse, any activity that may bring the Group into disrepute. This includes but is not limited to illegal, immoral, racist or other discriminatory activity.

K2. In engaging in activities which promote the work of the Group to the outside world, you must demonstrate commitment to the Group and support for its values, policies and goals.

K3. In representing the Group at formal or informal events, you must be appropriately dressed for the occasion.

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L. Learning and development

Main principle

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

You must attend all mandatory training in line with requirements, including mandatory on the job health and safety training and maintain your learning and development record.

Provisions

L1. You must play an active part in the Group's supervision and performance appraisal processes and welcome constructive feedback.

L2. At the appropriate induction, appraisal or supervision meeting, you must make clear your personal training and development needs, so that they can be taken into account in the Group's forward budgeting and planning.

L3. Unless there are exceptional reasons, you must attend all mandatory training, learning and development events that have been arranged, either for you alone or as part of a group.

Non-executive directors and trustees

L4. You must take responsibility for keeping your knowledge up to date in those areas in which you are a specialist.

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M. Reporting Concerns

Main principle

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

Provisions

M1. If you are aware of potentially dishonest or fraudulent activity or material breaches of this code by non-executive directors, trustees staff or others, you must report it to the appropriate senior person within the Group. The Group's Anti-fraud, Anti-money Laundering and Anti-Bribery Policy, Fraud Response Plan and Sharing Concerns at Work Policy give further guidance.

M2. If you believe that you are being required to act in a way which conflicts with this code, you must report it to the appropriate senior person within the Group.

M3. You must not victimise any person who has used, intends to use, or is suspected of having used the Group's confidential reporting procedures to report the misconduct, or alleged misconduct, of others.

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Appendix 1

Principles of public life

Staff, non-executive directors, trustees and involved customers will inevitably face situations not directly addressed by the code. In such situations they should be guided by the seven principles of public life established by the Committee on Standards in Public Life. Although housing associations are not public bodies, there is a general acceptance that those holding positions of leadership in associations should uphold the same values of selflessness, integrity, objectivity, accountability, openness, honesty and leadership. These are defined below.

Selflessness: Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or friends.

Integrity: Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

Objectivity: In carrying out public business, including making public appointments, awarding contracts or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability: Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness: Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty: Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership: Holders of public office should support and promote these principles by leadership and example.

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Appendix 2

Section 122 of the Housing and Regeneration Act 2008

122 Payments to non-executive directors, etc.

1. This section restricts the making of gifts, and the payment of dividends and bonuses, by a non-profit registered provider to:

- a) A member or former member of the registered provider;
- b) A member of the family of a member or former member of the registered provider; and
- c) A company which has, as a director, a person within paragraph (a) or (b).

2. A gift may be made, and a dividend or bonus may be paid, only if it falls within one of the following permitted classes.

3. Class 1 are payments which:

- a) Are in accordance with the constitution of the registered provider; and
- b) Are due as interest on capital lent to the provider or subscribed in its shares.

4. Class 2 are payments which:

- a) Are paid by a fully mutual housing association (within the meaning of section 1(2) of the Housing Associations Act 1985 (c.69); and
- b) Are due under:
 - i. Tenancy agreements with the association; or
 - ii. Agreements under which the former members became members of the association.

5. Class 3 are payments which:

- a) Are in accordance with the constitution of the registered provider making the payment ('the payer'); and
- b) Are made to a registered provider which is a subsidiary or associate of the payer.

6. If a registered company or industrial and provident society contravenes this section:

- a) It may recover the wrongful gift or payment as a debt from the recipient; and
- b) The regulator may require it to take action to recover the gift or payment.

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