

## Code of Conduct

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**Service area:** Governance  
**Owner:** Head of Governance

Scope		Entity		Business Stream	
Customers	✓	Progress Housing Group Limited (Parent)	✓	Progress Homes	✓
Colleagues	✓	Progress Housing Association Limited (PHA)	✓	RWP	✓
Non-Executive Directors / Trustees	✓	Reside Housing Association Limited (RHA)	✓	Progress Lifeline	✓
Third parties*	<input type="checkbox"/>	Key Unlocking Futures Limited (Key)	✓	Progress Living	✓
*Other: Involved customers, temporary staff					
Exclusions:					

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## **Section 1: Purpose and Policy Statement**

### **1. Purpose**

- 1.1 This Code of Conduct (the Code) sets out the standards that must be maintained to minimise reputational damage to the Group and the sectors that it operates in.

### **2. Policy statement**

- 2.1 The Code is based on four principles:

## **Principle 1 – Acting in the best interests of the Group and its customers**

- 2.2 Individuals have a responsibility to discharge their role in line with the purposes and values of the Group.
- 2.3 Individuals must fulfil their duties and obligations responsibly, acting at all times in good faith and in the best interests of the Group and for the delivery of its strategic objectives.
- 2.4 In representing the Group in any capacity, including at external events, in dealings with outside bodies and on social media, individuals are an ambassador for the Group and must uphold and promote its values, objectives and policies.

## **Principle 2 – Behaving with integrity**

- 2.5 The reputation and good name of the Group depends on compliance with this Code and with the laws, policies and procedures that it refers to. Individuals referenced within the scope need to act with integrity and this must be visible to all.
- 2.6 Individuals must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between their duties to the Group and their personal interests, other duties and relationships.
- 2.7 In an individual's role with the Group, they must not offer, seek or accept bribes or inducements to act improperly or corruptly. Individuals must not seek or accept gifts, hospitality or other benefits from any company or person that might reasonably be seen to compromise their judgement or integrity or place an individual under an obligation to the third party. Individuals must not seek or accept preferential treatment in the provision of benefits such as accommodation or employment.

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- 2.8 Individuals must not misuse the Group's funds or resources or seek preferential treatment for their own personal benefit.
- 2.9 Individuals must process information in accordance with the law and the Group's policies and procedures.
- 2.10 Individuals must report to the appropriate person within the association any reasonable suspicions they have about possible wrongdoing in line with the Group's relevant policies and procedures.

### Principle 3 – Conducting an individual self professionally and treating others well

- 2.11 Professionalism, consideration and respect for others, as well as a commitment to the principles of equality, diversity and inclusion are fundamental to the delivery of the Group's social purpose.
- 2.12 Individuals must treat all others with respect and consideration and in line with the Group's values.
- 2.13 Individuals must be professional, fair, and courteous in all dealings with residents and other customers.
- 2.14 Board members, colleagues and involved customers must maintain constructive, professional relationships with each other based on a sound understanding of their respective roles.
- 2.15 In partnership with the Group, individuals must take responsibility for their own learning and development, regularly updating and refreshing skills and knowledge.

### Principle 4 – Protecting an individual self, other people and the environment

- 2.16 Individuals have a responsibility while on the Group's business to protect their own health, safety, security, and wellbeing and that of others, and to minimise harmful environmental impacts.
- 2.17 An individual's conduct, actions and decision-making must promote the health, safety, security and wellbeing of an individual self or others.

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- 2.18 Within an individual's role at the association, they must strive to avoid or reduce possible negative environmental impacts in line with the Group's Environmental Sustainability Policy and mandatory training.

## **Section 2: Policy Guidance**

### **3. Direction**

- 3.1 Everyone who represents the Group must be held to the highest standard of conduct.
- 3.2 Individuals must also use good judgement. The Code cannot cover every situation. When acting on behalf of the Group, consider:
- Does it align with the purpose and values?
  - What impact will this have on customers and colleagues?
  - Will this have a negative impact on the Group's reputation?

### **4. Roles and responsibilities**

- 4.1 Specific expectations are set out in the National Housing Federation's Code of Conduct, available at appendix 1, and job descriptions. In addition:

## **The board and senior leaders**

- 4.2 The board and senior leaders must:
- ensure an appropriate framework of policies, procedures and delegations are in place
  - promote an open and transparent culture that supports individuals to meet their responsibilities and deliver the best possible service
  - lead by example.

## **Manager responsibilities**

- 4.3 Managers must ensure they :
- demonstrate behaviours appropriate to the Code
  - support team and colleagues to comply with the Code
  - highlight behaviours that do not align to the Code.

## **Colleague and involved customer responsibilities**

- 4.4 Colleagues and involved customers must demonstrate behaviours in line with the principles of the Code and highlight behaviours that do not align.

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## 5. Training

- 5.1 Policy updates will be communicated to internal and external customers in line with the Group's Reasonable Adjustments Policy.
- 5.2 Bespoke training is provided by the Governance Team. Any queries can be directed to [governanceteam@progressgroup.org.uk](mailto:governanceteam@progressgroup.org.uk).

## Section 3: Legal and regulatory

## 6. Legislation/regulation

- Companies Act 2006
- Governance Standard, Regulator of Social Housing

## 7. References

- National Housing Federation Code of Conduct 2022

## 8. Definitions

The Code	The Group's Code of Conduct
Colleague	A staff member of the Group
The Group	Progress Housing Group Limited (and subsidiary companies specified within the entities section)
Individuals	A person falling within the Scope of the policy
Involved customer	A customer, or someone who is acting as an advocate of a customer, when engaging in activities directly linked to the Group
Key Unlocking Futures Limited	A charitable subsidiary of the Group
Progress Homes	The brand name the Group uses when referencing general needs and independent living homes
RWP	The brand name the Group uses when referencing supported living homes

## 9. Associated policies and procedures

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Document reference	Name of document
GRPROGV15	Code of Conduct Procedures
EIAGOV01	Governance equality impact assessment
DPIAGOV01	Code of Conduct data protection impact assessment

#### **10. Equality impact assessment (EIA)**

- 10.1 An equality impact assessment has been undertaken to ensure that this policy does not negatively impact on people in the protected characteristic groups.
- 10.2 The updated Code aims to strengthen the Group's approach to equality, diversity and inclusion by being explicit about the behaviours of board members, colleagues and involved customers. There is a specific principle included within the Code that requires the above cohort to conduct themselves professionally and treat others well. It sets out the requirement for individuals to commit to the principles of EDI and to take responsibility for their own learning and development in this regard (in partnership with the Group). There is also a requirement to protect the health, safety, security and wellbeing of themselves and others.
- 10.3 No actions were identified as a result of undertaking the EIA.

#### **11. Data protection impact assessment**

- 11.1 A data protection impact assessment has been undertaken due to the need to gather personal data as part of the annual declaration of interest process.

#### **12. Customer voice and influence**

- 12.1 Customers were involved in the decision to adopt the National Housing Federation's Code of Conduct, acknowledging that this is the most appropriate code for the sector.

#### **13. Monitoring and review**

- 13.1 This policy falls within the Group's governance framework. Governance is included within the audit universe and assurance provided to the board through the three lines of defence model. Non-compliance is escalated by exception.
- 13.2 Specific aspects of this policy are monitored through defined processes that are set out in the Code of Conduct procedures document.

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13.3 This policy will be reviewed every three years unless an earlier review is prompted by an external or internal change.