



Code of Conduct for Staff Members

POLICY IMPLEMENTATION CHECKLIST	
Policy Guardian:	Chief Executive
Author:	Integration Director
Version number:	1.0
Approved by Chief Executive on:	March 2014
Approved by Caledonia Management Board on:	15 April 2014
Approved by Cordale Committee of Management:	8 April 2014
Effective from:	16 April 2014
Due for review on:	April 2016
Diversity compliant:	Yes
Equality Impact Assessment required:	No
Data Protection compliant:	Yes
Health & Safety compliant:	Yes
Procedure implemented:	Yes
QL system changes made:	N/A
KPIs / reporting arrangements implemented:	N/A
Training Completed:	
Posted on intranet:	30 April 2014
Posted on website:	1 May 2014
Publicity material issued:	N/A
Business Services – Implementation Review:	

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Introduction

There are references throughout this Code of Conduct (the Code) to 'you' and 'your' which means the member of staff of Caledonia Housing Association (Caledonia) or Cordale Housing Association (Cordale) who has signed this Code. References to 'we', 'us' and 'our' mean Caledonia Housing Association or Cordale Housing Association (as applicable to the member of staff.)

1. We attach the greatest importance to ensuring that high standards of behaviour are demonstrated by all of our people and in all of our activities.
2. This Code of Conduct sets out the standards of conduct required of you as a member of our staff.
3. As a Registered Social Landlord (RSL), we are required to adopt and comply with an appropriate Code of Conduct¹. This Code is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations and Employers in Voluntary Housing. Final confirmation is awaited from The Scottish Housing Regulator that this Code fully complies with its Regulatory Standards.
4. You must make yourself familiar with the terms of this Code and act in accordance with its requirements at all times. You are required to sign the Code (in the 'Statement of the Acceptance' at the end) to confirm that you have read and understood the terms of the Code and you have a personal responsibility to uphold the requirements of this Code.
5. You must also ensure you are familiar with, and comply with all of our policies.
6. If there are any aspects of this Code, or of any of the related policies, on which you are unclear, you must seek guidance from your line manager. Your manager, or Caledonia's Human Resources Team will also be able to give guidance where you are unsure how the Code or related policies apply in a particular situation.

Who the Code applies to

7. This Code of Conduct applies to everyone employed in Caledonia's Group of organisations.

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

How the Code is structured

12. The Code is based on the Nolan Principles on Standards in Public Life² which are recognised as defining good conduct for those who work for the public using public money.
13. We have defined three principles as the basis for the Code:
 - A Honesty and Integrity p 4-6
 - B Openness and Accountability p 7-9
 - C Selflessness, Objectivity, Leadership p10-13
14. 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, you should apply its intention and spirit to all situations in employment.

You 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.

² Committee for Standards in Public Life 1994, [Nolan Principles on Standards in Public Life](#)

The Code of Conduct

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

Gifts and hospitality

- A.1 You must not seek or accept any offers of gifts or hospitality from individuals or organisations that could reasonably be regarded as likely to influence your judgement or place you under an obligation to those individuals or organisations

Our policy on Entitlements, Payments and Benefits provides more details on how you should deal with offers of gifts and hospitality, including when these can and cannot be accepted.

Prevention of bribery

- A.2 We forbid all forms of bribery - meaning a financial or other advantage or inducement intended to persuade someone to perform improperly any function or activity. You must not offer, seek or accept bribes and must comply with our Anti-Bribery Policy. Offering, seeking or accepting bribes will result in disciplinary action and may also result in criminal prosecution.
- A.3 You must report to your manager or the Business Services Director (Caledonia Housing Association) any instances of suspected bribery within the organisation or any external organisation with which we have dealings.

Personal benefit

- A.4 You must not use, or seek to use, your position to promote your personal interests or those of any person with whom you are closely connected or the interests of any business or other organisation with which you have a connection.

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

- A.5 Our policy on Entitlements, Payments and Benefits outlines our requirements should you wish to procure the services of any of the contractors and suppliers on our approved list for your own personal use. You must never receive a better service or more favourable terms as a result of your employment with us.

Resources, facilities and premises

A.6 You must use our resources, facilities and premises only for the purposes intended and in a responsible and lawful manner. This includes office premises, telephone, computer and other IT facilities, equipment, stationery, transport and staff.

Reasonable personal use of office telephones and computers and company mobile telephones is permitted but must be kept to a minimum. Our policy on ICT gives further information including what is meant by 'reasonable personal use'.

A.7 You must comply with all of our relevant policies, including (but not exclusively) those relating to ICT, (including use of email and social media); Health & Safety; Equality and Diversity; Governance and Human Resources.

A.8 You must not undertake work for another organisation - or for any personal business - on our premises nor use our resources or facilities for such a purpose, unless you have specific permission from the Chief Executive, or another member of the Caledonia Executive Management Team, or Cordale's Senior Manager

Funds and expenses

A.9 Our funds must be safeguarded from abuse, theft or waste. You must at all times apply and observe all of our financial regulations and internal controls.

A.10 You must comply with our relevant policies when procuring goods/services or claiming expenses.

Tenants/service users and money

A.11 As a general rule, in relation to tenants and service users you must not:

- Give or loan them money
- Receive a gift or loan of money from them
- Invite or influence them to make a will or trust under which you are named as executor, trustee or beneficiary.

A.12 In circumstances where you have a close connection (see Appendix 1) to a tenant/service user, common sense will be applied and the organisation would not seek to impose restrictions on the private exchange of money between you and that individual.

General responsibilities

- A.13 You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.
- A.14 You must avoid any situation that could give rise to suspicion or suggest improper conduct.

- B. Openness and Accountability: You must declare all relevant personal interests. You must handle information in accordance with our policies and procedures. You must report to the appropriate line manager any reasonable and honest suspicions you may have about possible wrongdoing.**

Declaring interests

- B.1 Where you have a personal, business or financial interest in any matter that is relevant to our activities or is being considered (or is likely to be considered), or you know that someone to whom you are closely connected has such an interest, you must declare it promptly and record it in our Register of Interests.
- B.2 You must keep your entry in the Declaration of Interests Register complete, accurate and up to date.
- B.3 More details and examples are included at Appendix 1, and outlined within our Entitlements, Payments and Benefits Policy.

Handling information

- B.4 You must observe and uphold the legal requirements and our policies in respect of the storage and handling of information, including personal and financial information. Our Data Protection Policy gives further guidance.
- B.5 You must respond to requests for information positively and must not prevent people or bodies from being provided with information that they are entitled to receive.
- B.6 You must not use confidential information acquired through your work as one of our employees for your private interests.

Respecting confidentiality

- B.7 You must respect confidentiality and ensure that you do not disclose information to anyone who is not entitled to receive it, both whilst you are a member of staff and after you have left our employment.
- B.8 Unless specifically authorised to do so, you must not make comments or statements in public or to the media about us or our activities. If you are approached by the press or other media you must quickly pass the enquiry to Caledonia's Marketing and Communications Officer, a member of the Caledonia Executive Management Team, or Cordale's Senior Manager. Our

Media Handling Procedure provides further guidance on this.

- B.9 You must not publish any material or deliver any lecture or address any issues relating specifically to us 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”).

Reporting concerns

- B.11 If you become aware of any actual or potential fraud, corruption or wrongdoing, or breaches of this Code, you must report this to your manager or to Caledonia’s Business Services Director or appropriate line manager. You may do so on a confidential basis. Our Anti-Fraud Policy and Whistleblowing Policy gives further information.
- B.12 You 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: You must act in the best interests of the Caledonia Group at all times within the framework set by the organisation, working to promote our aims and objectives, upholding our values and setting a good example by your own conduct.

Fulfilling your role

- C.1 You must fulfil your duties responsibly, exercising reasonable skill and care and acting at all times in our best interests and that of our tenants and other service users.

As an organisation, we always aim to put the needs of our tenants and service users 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.2 You 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 you are in doubt as to the legal and regulatory requirements that are relevant to your role, you must seek guidance from your manager.

- C.3 You must work at all times in accordance with our policies and procedures and not allow your own personal or political opinions to affect the way in which you carry out your duties. This does not impinge on your right to be an active citizen or, for example, to be an active trade unionist.
- C.4 You must take direction from your line manager, other senior managers and the governing body, and exercise responsibly any authority that comes with your role as a staff member.
- C.5 You must not seek to use informal channels to influence the governing body regarding decisions to be made about the conduct of our business.
- C.6 You must consult your manager before taking on any outside work or any position (paid or unpaid) that will in any way impact on your role with us. Any such work or position must not interfere with your existing job or conflict with our interests. Appendix 1 gives more details on declaring interests.
- C.7 You must participate in any necessary training, and play an active part in our performance appraisal process. You will contribute to the identification of any personal training needs you may have in order to keep your

professional skills and knowledge up to date.

Working with tenants and other service users

- C.8 You must maintain high standards of professionalism, fairness and courtesy in all your dealings with tenants and other service users.
- C.9 You must not allow any personal relationship with a tenant or other service user to conflict with the conduct of your role and responsibilities.
- C.10 You must use the appropriate channels for handling tenancy and service provision issues. You must not act outside our established procedures in any matter concerning any tenant or other service user.

Upholding our reputation

- C.11 You must not act in a way that could reasonably be regarded as bringing us 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 you have a grievance or concern relating to a member of staff or of the governing body or have any concern about potential wrongdoing you should discuss it with your line manager or with another appropriate senior staff member. Our Grievance Policy and Procedure provides further guidance on this.

- C.12 You must always be a positive ambassador for us and our work, especially when attending events as a member of our staff or in dealing with outside bodies.

Showing respect for others

- C.13 You must treat others with respect at all times. This includes considering the views of others and being tolerant of differences.
- C.14 You 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.15 You must always conduct yourself in a courteous and professional manner. You must not, by your actions or behaviour, cause distress, alarm or offence.
- C.16 You must not harass, bully or attempt to intimidate any person.

C.17 When attending meetings, you must be courteous to all attendees and respect the position of the meeting chair or convenor. You must also ensure that mobile phones are switched off/on silent other than in very exceptional circumstances where it is necessary to take an urgent call.

Breach of the Code

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

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 Caledonia Housing Association / Cordale Housing Association (delete as applicable).

I confirm that I am aware of the restrictions on payments and benefits and personal interests. 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 the Group’s disciplinary procedures and could ultimately result in my dismissal.

Signed _____

Date _____

This Code of Conduct
will be reviewed not later than April 2017.

Appendix 1

Declaring and Managing Personal Interests

1. Introduction

- 1.1 Being a member of our staff is of course only one part of your life. Other aspects of your life - such as family, friends and neighbours, voluntary work, causes you support, possibly business or financial interests, possibly your own housing arrangements - may have the potential to cross over into your role as a staff member.
- 1.2 However, as we are an organisation that works for the community, it is essential that there is no conflict - and that there can be no reasonable perception of conflict - between your duties as a member of staff and your personal (or personal business or financial) interests.
- 1.3 Any potential conflict between your position as a member of our staff and your other interests must be openly declared and effectively managed so as to protect the good reputation of Caledonia Group and the RSL sector.
- 1.4 As stated in the Code (provision B1), where you have a personal business or financial interest in any matter that is relevant to our activities or is being considered (or is likely to be considered) or you know that someone to whom you are closely connected has such an interest, you must declare it promptly and record it in the Declaration of Interests Register.
- 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 you 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.
 - Ownership or part ownership of a business by you or someone to whom you are closely connected that we do business with or may consider doing business with.

- 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 or campaigning 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 If you are not sure whether a certain matter needs to be declared, you must seek guidance from your line manager in the first instance. Further guidance is available from Caledonia's Business Services Director. If doubt remains, the advice would be always to declare the matter.
- 2.3 You 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 reputation of both yourself and the organisation.
- 3. Definition of 'close connection'**
- 3.1 Someone 'closely connected' to you includes family members and persons who might reasonably be regarded as similar to family members even where there is no relationship by birth or in law.
- 3.2 The following table outlines those who you should consider when declaring interests:

Table A

Group 1 Members of your household	Group 2 People closely associated with you	Group 3 Others you need to consider
<p>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</p> <p>You must always declare any interests covered by this Code relating to people in this group</p>	<ul style="list-style-type: none"> • Parents, parents-in-law and their partners • Sons and daughters; stepsons and step-daughters and their partners • Brothers and sisters and their partners • A partner's parent, child, brother or sister • Grandparents, grandchildren and their partners • Someone who is dependent on you • Close friends <p>Provided you are in regular contact, you should declare any interests covered by this Code relating to people in this group</p>	<p>Other friends</p> <p>This could include:</p> <ul style="list-style-type: none"> • Someone you are acquainted with socially • Neighbours • Business contacts/associates <p>You are expected to exercise sound judgement when declaring/recording the any interests relating to people you are in regular contact with in this group</p>

3.3 With the exception of members of your household (Group 1), we recognise that you will not always be closely acquainted with or in regular contact with all of the people listed. We do not expect you to go to unreasonable lengths to identify actions or involvement that are covered by this Code. We only expect you to be aware of and declare actions or involvement relating to people to whom you are closely acquainted and are in regular contact with.

3.4 More details are outlined in our Entitlements, Payments and Benefits Policy.

4. Declaring personal interests

- 4.1 On appointment, all new employees are required to complete a Declaration of Interest Form. All relevant declared interests are recorded in the Declaration of Interests Register. You will be requested to update this form annually.
- 4.2 Notwithstanding this, as stated in the Code (provision B2), you must keep your entry in the Declaration of Interests Register up to date, add any new interests as soon as they arise, and amend existing interests as soon as any change takes effect. Further details are contained within the Group's Governance Procedures.
- 4.3 A situation may arise where you are invited to be present at a meeting where a matter in which you have a personal (or a personal business or financial) interest is discussed. In such cases you must inform the meeting chair at the start of the meeting, or as soon as you become aware that this is the case. You would then be required to leave the meeting for the duration of the particular item. If in any doubt, you should ask the meeting chair or another senior person present for guidance. This applies to all meetings that you attend as a member of 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.