



<b>Policy Name</b>	Code of Conduct for Staff
<b>Policy Category</b>	Staffing
<b>Policy Number</b>	S04
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<b>Links to other Policies</b>	S01 Conditions of Service, S18 Whistleblowing, G12 Gifts and Hospitality
<b>Consultation</b>	Staff, Committee

*This document will be made available in different languages and formats on request, including Braille and audio formats.*

- **POLICY AIMS AND OBJECTIVES**

This Code of Conduct is for staff of Knowes Housing Association. Staff should familiarise themselves with the contents of the code and should act in accordance with the principles set out in it.

- **LEGAL FRAMEWORK**

Through this Code of Conduct and the other Policies and Procedures adopted by the Association, it is intended that staff through complying with these policies will also comply with current employment legislation.

- **RISK ASSESSMENT**

This Code of Conduct is put in place to address the risks related to possible claims from divulging confidential information, inappropriate behaviour by or towards staff or customers and inappropriate use of Association property.

## Introduction

*There are references throughout this Code of Conduct (the Code) to 'I' and 'you' which means the member of staff of Knowes Housing Association Ltd who has signed this Code. References to 'we', 'us' and 'our' mean Knowes Housing Association Ltd.*

1. Knowes HA attaches 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. You are required to observe these standards in all the activities that you undertake in connection with your employment with us. You are also required to uphold our Values which are:
  - *Respect and Equality of Opportunity*  
We treat everyone with respect and recognise and respond to their individual needs.
  - *Customer Focussed*  
We ensure that our customers and community are at the centre of everything we do.
  - *Communication*  
We communicate effectively with our customers and colleagues.
  - *Continuous Improvement*  
We are committed to reviewing, developing and improving all of our services and processes.
  - *Honesty and Professionalism*  
We behave in a professional manner and act with honesty and integrity
3. As a Registered Social Landlord (RSL), we are required to adopt and comply with an appropriate Code of Conduct<sup>1</sup>. This Code is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations with input from Employers in Voluntary Housing (EVH) – which the Scottish Housing Regulator (SHR) has confirmed 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' on p10) 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

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<sup>1</sup> Scottish Housing Regulator (2024) Regulatory Framework, [Regulatory Standard 5.2](#)

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 manager. Your manager, or the Chief Executive Officer (CEO), will also be able to give guidance where you are unsure how the Code or related policies apply in a particular situation.
7. This Code of Conduct was adopted by the committee on 12<sup>th</sup> November 2024.

### **Who this code applies to**

8. This Code of Conduct applies to everyone who works for us whether employed directly or otherwise.
9. A copy of this Code will be given to every person it applies to.

### **How the Code is structured**

10. The Code is based on the Nolan Principles on Standards in Public Life<sup>2</sup> which are recognised as defining good conduct for those who work for the public using public money.
11. We have defined three groups of principles as the basis for the Code:
  - A [Honesty and Integrity](#)
  - B [Openness and Accountability](#)
  - C [Selflessness, Objectivity and Leadership](#)
12. 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 10 which also outlines the implications for any breach of the code.**

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<sup>2</sup> Committee for Standards in Public Life (May 1995), [Nolan Principles](#)

## 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** I will act, and ensure I am seen to act, wholly in the interests of our organisation, our tenants, other residents in our communities and other service users. I will ensure that I do not benefit improperly from my position.
- A.2** I will not accept any offers of gifts or hospitality from individuals or organisations which might reasonably create – or be capable of creating – an impression of impropriety or influence or place me under an obligation to these individuals or organisations. I will comply with Knowes HA's Entitlements Payments and Benefits Policy.

### Prevention of bribery

- A.3** We must comply with anti-bribery legislation. I will comply with our anti-bribery and corruption policies.
- A.4** 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. I will not offer, seek or accept bribes or other inducements from any individual or organisation and I will comply fully with our policy on bribery (Anti-Bribery Policy). I am aware that offering, seeking or accepting bribes or other inducements will result in disciplinary action and may also result in criminal prosecution.
- A.5** I will report to my manager or the CEO any instances of suspected bribery or corruption within the organisation or any external organisation with which we have dealings.

### Personal benefit

- A.6** I recognise that neither I, nor someone closely connected to me, can, as a result of my role with the organisation, receive preferential treatment relating to any services provided by the organisation or its contractors/suppliers: I will ensure that I can demonstrate this.
- A.7** I will not use, or seek to use, my position to promote my personal interests or those of any person with whom I am closely connected, or the interests of any business or other organisation with which I have a connection.

## **Resources, facilities and premises**

- A.8** I will only use our resources, facilities and premises 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.
- A.9** I will comply with all of our relevant policies, including (but not exclusively) usage of internet & email social media, health & safety, equalities, inclusion, human rights and diversity and dignity at work.
- A.10** I will not undertake work for another organisation - or for any personal business - on [name of organisation]'s premises nor use our resources or facilities for such a purpose, unless I first have specific permission from my line manager.

## **Funds and expenses**

- A.11** I recognise that Knowes HA's funds must be safeguarded from abuse, theft or waste. At all times, I will apply and observe all of our financial regulations and internal controls.
- A.12** I will comply with our relevant policies when procuring goods/services and/or claiming expenses.

## **Tenants/service users and money**

- A.13** As a general rule, in relation to tenants and service users I will 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 I am named as executor, trustee or beneficiary.

## **General responsibilities**

- A.14** I will not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.

I am aware that under the Equality Act 2010, the following nine characteristics are specifically protected: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

- A.15** In presenting information I will take all reasonable steps to ensure that I set out the facts and relevant issues truthfully.
- A.16** I will avoid any situation that could give rise to suspicion or suggest improper conduct.

- A.17** I will inform my manager or the CEO if I am notified of any action by a professional body that is relevant to my role with Knowes HA and/or which could impact Knowes HA's reputation that I am or may be party to.

## **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 senior person (Your Manager or the CEO) within Knowes Housing Association Ltd any reasonable and honest suspicions you may have about possible wrongdoing.

### **Declaring interests**

- B.1** I recognise that Knowes HA must ensure that no conflict arises, or could reasonably be perceived to arise, between my duties and my personal interests, financial or otherwise. I will declare, and manage openly and appropriately, any actual or potential interests or conflicts.
- B.2** Where I have a personal, business or financial interest in any matter that is relevant to Knowes HA's activities or is being considered (or is likely to be considered), or I know that someone to whom I am closely connected has such an interest, I will declare it promptly and record it in the Register of Interests.
- B.3** I will keep my entry in the Register of Interests complete, accurate and up to date.

### **Handling information**

- B.4** I will 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** I will respond to requests for information positively and will not prevent people or bodies from being provided with information that they are entitled to receive.
- B.6** I will not use confidential information acquired through my work as one of our employees for my private interests or any other purpose for which it is not intended.

### **Respecting confidentiality**

- B.7** I will respect confidentiality and ensure that I do not disclose information to anyone who is not entitled to receive it, both whilst I am a member of staff and

after I have left employment at Knowes HA.

- B.8** Unless specifically authorised to do so, I will not make comments or statements in public or to the media or on social media sites or pass any documents or other information to the press or media about us or our activities. I will pass any such enquiries to the Chief Executive Officer quickly.
- B.9** I will not publish any material or deliver any lecture or address any issues relating specifically to us or our activities without prior approval. This includes invitations to speak at conferences or external events.

### **Using social media**

- B.10** I will not disclose any private or confidential information relating to us, our customers, partners, suppliers, committee members, or employees on any social networking sites, bulletin boards, blogs or similar. (See also C12 under “Upholding our reputation”). This applies whether I am posting under my own name or a pseudonym.

### **Reporting concerns**

- B.11** If I become aware of any actual or potential fraud, corruption or wrongdoing, or breaches of this Code, I will report this to my manager or to [*title of relevant post or posts*]. I am aware that I may do so on a confidential basis. Our policy on whistleblowing gives further information.
- B.12** I will 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 Knowes HA 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** I will comply with the terms of my appointment and our policies and procedures relating to my role.

**C.2** I will fulfil my duties responsibly, exercising reasonable skill and care and acting at all times in Knowes HA's best interests and that of our tenants and other service users.

I will always aim to put the needs of Knowes HA's tenants and service users first in my day-to-day work, within the framework of our policies and procedures.

**C.3** I will uphold and promote Knowes HA's values, 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 I am in doubt as to the legal and regulatory requirements that are relevant to my role, I will seek guidance from my manager.

**C.4** I will work at all times in accordance with our policies and procedures and I will not allow my own personal or political opinions to affect the way in which I carry out my duties. This does not impinge on my right to be an active citizen or to be an active trade unionist.

**C.5** I will take direction from my line manager, other senior managers and the governing body, and exercise responsibly any authority that comes with my role as a staff member.

**C.6** I will not seek to use informal channels to influence the governing body regarding decisions to be made about the conduct of our business.

**C.7** I will consult my manager before taking on any outside work or any position (paid or unpaid) that could in any way impact on my role with Knowes HA. I recognise that any such work or position must not interfere with my existing job or conflict with Knowes HA's interests.

**C.8** I will participate in any necessary training and play a constructive part in our

performance appraisal process. I will contribute to the identification of any personal training needs I may have in order to keep my professional skills and knowledge up to date.

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

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

### **Upholding our reputation**

- C.12** I will not act in a way that could reasonably be regarded as bringing or risks bringing Knowes HA 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.

I will discuss any grievance or concern that I have about a member of staff or the [Board] with my line manager or with [title of relevant post].

- C.13** I will always be a positive ambassador for Knowes HA and our work, especially when attending events as a member of our staff or in dealing with outside bodies.

### **Showing respect for others**

- C.14** I will always treat others with courtesy and respect. I will consider and respect the views of others.
- C.15** I will adhere to both the letter and the spirit of our Equality and Diversity Policy and our Dignity at Work Policy. See also A.14 about the need to avoid discrimination of any kind.
- C.16** I will always conduct myself in a courteous and professional manner. I will not, by my actions or behaviour, cause distress, alarm or offence.
- C.17** I will not harass, bully or attempt to intimidate any person.
- C.18** I will take care when displaying materials in the office and ensure that these would not reasonably cause offence to colleagues.
- C.19** When attending meetings, I will be courteous to all attendees and respect the position of the meeting chair or convenor.

## **Breach of the Code**

As a member of staff you have a responsibility to promote and uphold the requirements of this Code and any other Code that your membership of a relevant professional body imposes. If you consider that you may have breached this 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 the CEO.

Any material breach of the Code will be considered under our disciplinary procedures and may result in a disciplinary action being taken, which could, depending on the facts of the situation, 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 and Signature**

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 Knowes Housing Association Ltd.

I understand that the Code of Conduct applies regardless of where or how I am working and includes in the office, at meetings, at home and virtually.

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

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

Signed \_\_\_\_\_

Date \_\_\_\_\_

### Declaring and Managing Personal Interests

#### 1. Introduction

- 1.1 Being a member of Knowes HA 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 and uses public funds, 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 Knowes HA 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 Register of Interests.
- 1.5 This Appendix gives further guidance on how to declare and manage any personal (including personal business or financial) interests.

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

- 2.1 The following are examples of the kind of interest that you must declare. Please note that this list is not exhaustive, and there may be other interests that 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.
  - Membership of a community or other voluntary organisation that is active in the area(s) we serve.
  - Voluntary work with another RSL or with an organisation that does, or is likely

to do, business with us.

- Membership of the governing body of another RSL.
- Being an elected member of any local authority where we are active.
- If you purchase goods or services from us.
- If you purchase goods or services from one of our approved contractors or Framework Agreement partners.
- Significant shareholding in a company that we do business with.
- Membership of a political, campaigning or other body whose interests and/or activities may affect our work or activities.
- Ownership of land or property in our areas of operation excluding for the purpose of your own residential use (i.e. there is no requirement for you to declare any house in which you currently live).
- Unresolved dispute relating to the provision of services in connection with a tenancy or occupancy agreement or a contractual dispute over the provision of goods or services with us.

2.2 If you are not sure whether a certain matter needs to be declared, you must seek guidance from your manager or from the Director. If doubt remains, the advice would always be 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 reputations 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**

<b>Group 1 Members of your household</b>	<b>Group 2 People closely associated with you</b>	<b>Group 3 Others you need to consider</b>
Anyone who normally lives as part of your household, whether they are related to you	Parents, parents-in-law and their partners Sons and daughters; stepsons and step-	Other relatives (e.g. uncles, aunts, nephews & their partners)

<p>or not, including spouses/partners who work away from home and sons and daughters who are studying away from home</p>	<p>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 or whom you are dependent on  Close friends</p>	<p>Other friends (e.g. someone you are acquainted with socially, neighbours, business contacts/associates)</p>
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- 3.3 If you become aware of any action or involvement relating to **anyone** in the table then you should declare and manage this as soon as possible.
- 3.4 However, we recognise that you will not always be closely acquainted with or in regular contact with all of the people listed and we do not expect you to go to unreasonable lengths to identify actions or involvement that are covered by this policy
- 3.5 Please note, we do expect you to be familiar with the actions of members of your household (Group 1) and of any other people listed in the table above with whom you are closely associated and/or in regular contact and you must take steps to identify, declare and manage these.
- 3.6 **You are not expected to be aware of the actions of people in groups 2 and 3 that you do not have a close association and/or regular contact with.** We do not expect you to research into the employment, business interests and other activities of all persons with whom you are closely connected.
- 3.7 In relation to 3.3 – 3.6 above, when considering your actions you should do so from the point of view of a reasonable and objective observer.

#### **4. Declaring personal interests**

- 4.1 On appointment all staff members are required to complete a declaration of interest form to register any personal interests that could potentially conflict with their role and thereafter to complete a new form whenever there is a material change.
- 4.2 As stated in the Code (provision B2), you must keep your entry in the Register of Interests up to date, add any new interests as soon as they arise, and amend existing interests as soon as any change takes effect.
- 4.3 A situation may arise where 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.

## Appendix B

# Further Guidance

## **Further Guidance on Implementing Model Code of Conduct for Staff**

This Guidance has been prepared to assist organisations in implementing and applying the Code of Conduct for staff. It is not intended that the guidance is issued to staff members – rather it is aimed at organisations to assist in interpreting its terms.

The Code of Conduct sets out the requirements and expectations which are attached to the role of staff members, who have a personal responsibility to uphold both the spirit and the requirements of the Code. Each staff member must sign the Code of Conduct on appointment and it should be signed annually thereafter. It can be useful to coincide this with the annual appraisal.

The Code of Conduct is supported by the role description for individual posts. It should form part of the induction process for new staff.

### **Breach of the Code**

If a complaint is made or concern is raised that a member of staff may have breached any part of the Code, the matter will be investigated in accordance with the terms of the RSL's disciplinary or grievance policy.

There are references throughout the Code to internal policies and procedures, which all staff are expected to be familiar with. The RSL must ensure that all staff are well informed about their responsibilities and have access to regular training and support to enable them to meet their requirements. Staff must also have ready access to the policies and procedures which they are expected to follow in order to fulfil their role and meet their commitments as set out in the Code of Conduct. (C3-C4)

### **How the Code is structured**

The Code is based on the seven principles which are recognised as providing a framework for good governance. They demonstrate honesty, integrity and probity. It must be remembered that staff members and RSLs are always responsible for ensuring that their conduct at all times meets the high standards that the RSL sector is recognised for upholding.

In the Code, each principle is described, as it applies to the activities of an RSL and its staff. This guidance is offered to support the application of the Code of Conduct by providing some illustrations of the practical application of the Code's requirements. It is emphasised that the guidance is not exhaustive.

The seven principles are grouped together into three 'sections':

- Honesty and Integrity
- Openness and Accountability
- Selflessness, Objectivity, Leadership

The remainder of this guidance offers some illustrations of how each of the principles may be applied to the role of a staff member.

Please note, there are references throughout to the need for staff members to 'be familiar' with the terms of policies and other documents. This does not require a detailed knowledge of the content of all the documents but rather an awareness of their key principles and ready access to them in the event that the detail is necessary.

## **A. Honesty and Integrity**

This principle emphasises the importance of always acting honestly and in good faith. In practice, this means that a staff member cannot accept gifts or hospitality that are not permitted by our Gifts and Hospitality Policy.

Staff members have an individual duty to report any concerns they may have about possible fraud, corruption or wrong-doing (A5). Staff must, therefore, be familiar with the terms of our Anti-Bribery Policy (A3; A4). Staff are expressly forbidden to accept any gifts or other inducements which might create, or be capable of creating, a sense of obligation to another party (A2).

A6-A7 further emphasise the responsibility to ensure that neither an individual member of staff, nor someone closely connected to them is seen to benefit inappropriately from their role with an RSL and that they must be very open in declaring all relevant personal interests. In practice, this means ensuring that staff are not involved in any decisions which personally impact or affect them or someone they are close to. This emphasises the need for openness in declaring interests. Declarations must be made to (or notified to) the line manager to ensure that there is an awareness of any situations which might require to be managed (B2 – B3). RSLs should ensure that staff members are aware that their [EPB or equivalent] policy explains how someone closely connected to you is identified.

A8-A12 stress the commitment to ensure that the RSL's funds and resources are used properly and for legitimate purposes. This means that decisions and actions in this respect must fit with, amongst other things:

- the RSL's permitted purpose and objectives,
- the RSL's business plan
- the terms of the RSL's loans and grant-making authorities,
- all relevant policies.

In relation to A8, please note reasonable personal use of office telephones and computers and company mobile telephones is permitted but must be kept to a minimum. Further information - including what is meant by 'reasonable personal use' – should be provided to the staff member in a relevant policy.

A9 means, among other things, that staff must uphold and be familiar with the

RSL's policies relating to Equalities, Diversity, Inclusion and Human Rights and Dignity at Work. This requirement relates to all engagements with staff colleagues, governing body members, tenants, customers, partners and agents. In practice, this means listening to and considering other views and respecting opinions even if they are very different from an individual's own. Related to this, A14 is a specific commitment to promote and uphold the RSL's Equality and Diversity policy.

A13 states that as a general rule you cannot give (or receive) loans from tenants/service users. Please note that in circumstances where a staff member has a declared family connection to a tenant/service user, common sense should be applied and the organisation would not seek to impose restrictions on the private exchange of money between the staff member and that individual.

## **B. Openness and Accountability**

This principle sets the framework for ensuring that transparency and openness are evident. In practice, this means that staff must identify and declare all personal interests which are relevant to the RSL's work and to their role with the organisation. Staff must be familiar with the process for declaring interests and must make sure that the Register of Interests is accurate and up to date at all times. Staff must ensure that they are well informed about the RSL's policy on declaring interests, which forms part of the organisation's EPB (Entitlements, Payments and Benefits) Policy (B1 – B3).

Staff must always be careful and cautious about how their actions may be viewed by others and take care to avoid anything which could compromise or embarrass themselves or the RSL (B2).

B4 - B7 relate to confidentiality and the importance of maintaining it. This applies to the content of reports, discussions at governing body meetings and all other business that staff are engaged on. Upholding this principle requires staff to respond positively to requests for information (B5) but also not to discuss anything that is identified as being confidential with anyone who is not entitled to the information (B7). It also means making sure that any papers are stored securely (e.g. by means of passwords on laptops or other devices, in a locked drawer) and that on-line discussions cannot be overheard (e.g. if attending a virtual meeting). In applying this principle, staff must also be mindful of the RSL's duties in respect of safeguarding personal information i.e. anything from which an individual can be identified. It must be remembered that the Code of Conduct applies regardless of where staff are working – in the office, at meetings, at home, virtually.

Our Scheme of Delegation identifies who is authorised to make public comments on our behalf. It is not normally appropriate for a staff member to speak in public without prior agreement from their line manager. This includes, for example, accepting an invitation to contribute to a conference or event (B9). The Code's principles also extend to social media activities (B8 and B10).

Please note, that RSLs must respect any member of staff's right to a private life, and that includes joining any social media sites that they may wish. However, as information posted on such sites is classed as public and not private, the clause at B10 relating to social media is necessary.

B11 refers to our Whistleblowing policy and sets out a commitment to report any suspicions of wrongdoing. B12 is a commitment not to victimise any colleague who may be party (directly or indirectly) to a whistleblowing action. This reflects the regulatory requirement for RSLs to have a whistleblowing policy, as well as Regulatory Standard 5.6 that requires '*clear procedures for employees and governing body members to raise concerns or whistleblow if they believe that there has been fraud, corruption or other wrongdoing within the RSL*'

### **C. Selflessness, Objectivity and Leadership**

The principle contains a commitment to always act in the RSL's best interests and to support and promote its aims and objectives. C2 is a commitment to put the interests of tenants first, within the RSL's policy framework, and C3 is an express commitment to promote and uphold the organisation's values, aims and objectives. This commitment extends to ensuring that staff are familiar with relevant legal and regulatory requirements in exercising their responsibilities and states that they should seek advice from their line manager if in doubt.

C4 emphasises the importance of putting personal opinions aside when applying the RSL's policies and procedures but is explicit in confirming that individuals have the right to be active in the workplace e.g. by taking on the role of shop steward or employee representative.

C6 highlights that individual staff members should not seek to 'lobby' members of the governing body, either individually or collectively. In practice, this principle seeks to ensure that relationships are professional: amicable and constructive with respect for the boundaries between the strategic role of the governing body member and the operational responsibilities of senior staff.

C7 is an obligation to consult with their line manager if a member of staff intends to take on an additional role. This could include, for example, becoming a member of the governing body of another RSL or voluntary organisation or contributing to the activities of a training or campaigning body. In considering such a proposal, it is important to ensure that there would be no conflict with or risk of compromise to the responsibilities associated with the employee's job.

C9-C11 are intended to emphasise the importance of staff maintaining professional and appropriate standards in all of their engagement with tenants and other customers.

C12 – C13 commit staff to refraining from publicly criticising or making negative comments about the RSL. This principle is not intended to prevent staff from disagreeing with a proposal or challenging a decision; rather it is intended to

ensure that they do not actively and/or publicly undermine the organisation. In practice, this means, for example, that staff should not question in public why a decision was taken or criticise the organisation. A similar provision is contained in the Code of Conduct for Governing Body Members.

C14 -C18 relate to the importance of staff being respectful and courteous in all actions associated with their role. C14 and C16 specify that staff will always be courteous and respectful to others and that their actions will not cause distress or alarm or offence. It also means recognising and acknowledging that what is acceptable in terms of language and conduct change and being mindful that differences in cultures, faiths and beliefs can be very significant and sensitive.

C17 is an undertaking not to harass, bully or attempt to intimidate anyone – this applies to other members of staff, members of the governing body and to tenants and other customers. C18 is a reminder that care must be taken when displaying materials in the office environment and that staff must be mindful of the potential for offence to be caused by items that might seem insignificant (e.g. mugs, scarves). Whilst a 'one-off' instance of thoughtlessness in this regard may be unlikely to prompt formal action, it would be appropriate to remind people of their responsibilities under the terms of the Code under such circumstances.