

Joint Code of Conduct

Adopted:	
Contact Officer:	Head of Legal and Governance
Last Amended/Reviewed:	First version of policy'
Version/Reviewed by:	V1 – 1 st version 30 th April 2019 by Board V2 – V3 –
Next Formal Policy Review:	3 Yearly – April 2022
Formal Review of Policy by:	Board
Policy Links:	Probity Policy Anti-Fraud and Corruption Policy Bribery Policy Money laundering Policy Modern slavery Statement Equalities and Diversity Policy Dignity at Work Policy Disciplinary Policy and procedures Related HR Policies

Brief Policy Summary:
<p>A Code of Conduct which sets out LHP expectations of the behaviour and standards expected to be maintained by Board/Committee members, employees and Involved Residents in furtherance of LHP high standards of governance and propriety as well as meeting legal compliance within the workplace and dealings with others.</p>

PURPOSE

This Code of Conduct ensures that LHP has a reputation as an organisation enjoying a high standard of governance, integrity and behaviour together with a commitment to customer service and value for money. In particular that we engage with each other in a professional manner, with dignity and respect, and avoiding any suggestion of influence by biased or improper motives.

SCOPE

Except where otherwise indicated, the Code applies equally to board, co-opted and committee members and all employees as well as involved residents on our Scrutiny Panels

POLICY STANDARDS

A. General Provisions

Main Principle: The Code sets out key duties, obligations and expectations that all involved for LHP act in good faith and in the best interests of LHP

Provisions

- a. The reputation of LHP as an open, fair, professional organisation with a high standard of integrity and commitment to equality, diversity, human rights and customer service is dependent primarily upon the conduct and behaviour of its Board and committee members, involved residents and employees.
- b. This code of conduct sets out the standards of behaviour expected.
- c. The code forms part of the contract of employment for all LHP employees and within the Services agreements for Board/Committee members, and all parties are required to adhere to it at all times.
- d. Breaches of the code may lead to disciplinary action.
- e. This code makes reference to other policies which are displayed on the intranet and on the Board reading room for which all have a responsibility to read and make themselves aware of.

B. RESPECT FOR CUSTOMERS AND OTHERS

Main Principle: You must treat others with dignity and respect

Provisions

- a. customers and stakeholders with courtesy at all times.
- b. You should comply with LHP's Equality and Diversity Policy at all times where relevant to your work.

- c. In dealing with difficult situations you should maintain high levels of professionalism and fairness (and for employees to utilise the Mary Guber International principles to handle these situations). Rudeness to others is not acceptable in any circumstances.
- d. You should be aware of and work to any service or similar standards which apply to your role.
- e. Employees should relate to customers and other employees from a solution oriented 'in the black' i.e. a positive You are expected to treat colleagues, third parties, tenants, leaseholders and other position. Employee's general actions, behaviour and demeanour while at work should be such as to present LHP as a professional and effective organisation. Employees should avoid conduct that may be perceived negatively.
- f. You should conduct yourself in a manner which would not reasonably be regarded as bringing your position within LHP into disrepute or in any respect damage the interests or reputation of LHP or in any way amount to an abuse of position of trust .
- g. You should conduct yourself in a way which would not result in adversely affecting your judgement or capacity when acting for LHP.
- h. h. You should not harass, bully or intimidate colleagues, employees, tenants, stakeholders or others (contrary to the Dignity at Work Policy or the Equality and Diversity Policy or otherwise)
- i. You should not condone the display of materials in the workplace which other people might reasonably find offensive, or use language which work colleagues, visitors or customers might reasonably find offensive

C. CONFIDENTIALITY

Main Principle: LHP is committed to the open conduct of its business. However, There will be times when confidentiality about personal information relating to third parties, tenants, leaseholders and colleagues should be maintained.

Provisions

- a. You should abide by procedures designed to protect the confidentiality of information held about third parties, tenants, customers or other colleagues and employees.
- b. You should not disclose information about tenants to third parties, including neighbours, unless authorised to do so, or with the tenant's consent.
- c. Confidential business information should not be disclosed to external parties unless it is appropriate to do so. This would include matters relating to LHP's finances, future development programmes, personal information, discussions with potential partners and contract proposals. Some information in these areas may already be in the public domain but if you have any doubts you should seek clarification (for employees from their line manager or the GDPR officer and for Board members from

the Chief Executive or Company Secretary) before disclosing any information which may be commercially sensitive. ***The wilful or reckless unauthorised disclosure of confidential information will be regarded as gross misconduct under LHP's disciplinary policy for employees and a governance breach for Board members.***

- d. You should make yourself aware of LHP's Data Protection Policy Statement and General Data Protection Regulations procedures and exercise particular care in disclosing personal information which comes within the GDPR legislation.
- e. You must not engage in any conversation either with colleagues or others about customers or colleagues that is prejudiced and judgemental. Where information needs to be shared for the purposes of work it should be done through proper channels and maintaining confidentiality.
- f. These duties and obligations regarding confidentiality and GDPR equally apply to you in your private time. You must not discuss personal information relating to your work with LHP in a public place or other situation where unauthorised disclosure to a third party could occur whether intended or not.

D. RELATIONSHIPS

Main Principle: All Board and Committee members, employees and involved residents must maintain a constructive, professional relationship based on a sound understanding of their respective roles.

Provisions

Employees

- a. If you are involved in a close personal relationship with a colleague, contractor or supplier you must not allow that relationship to influence your conduct while at work and this must be declared to your line manager immediately.
- b. Intimate behaviour during work time, for example kissing, touching or holding hands, is expressly prohibited. This rule applies during all working time, whether at the normal workplace, or whilst away from LHP's offices or elsewhere. Any breach of this rule will be regarded as a disciplinary offence leading to disciplinary action up to and including dismissal.
- c. Any employee who embarks on a close personal relationship with another employee of the organisation must declare the relationship to their manager. If the relationship is between a manager/supervisor and an employee whom they supervise, the relationship should be declared to a senior manager to assess whether this will have an impact on the working relationship and the effective working of the department.

- d. When you come into contact with the board or a committee or residents panel, you must:
- Take direction from the Board or committee/panel acting with delegated powers
 - Respond constructively to questions and challenges
 - Respond promptly to requests for information.
 - Avoid inappropriate personal familiarity and using informal channels for lobbying or attempts to influence

Board and Committee members

- a. You have duties to promote the best interests of LHP and this should be conducted in a constructive and professional relationship with employees
- b. You should not become pre-occupied in operational matters
- c. In dealings with employees you should set an example of leadership by demonstrating the highest standards of integrity and ethics and empathy with LHP values.

Involved Residents

- a. You should not use your position to seek to instruct or direct a member of staff or LHP contractor.

E. RELATIONSHIPS WITH RESIDENTS AND SERVICE USERS

Main Principle: You should maintain high standards of professionalism, fairness and courtesy in all dealings with residents and service users.

Provisions

- a. You should not allow any personal relationship with a resident or service user to conflict with your role and responsibilities
- b. As an employee you should not:
- Give gifts or loans of money to or receive loans or gifts of money from, residents or other service users
 - Invite or influence a resident or other service user to make a will or trust under which you are named as an executor, trustee or beneficiary
 - Handle residents' or service users' money without ensuring a receipt is completed for each transaction

F. POLICIES, PROCEDURES AND OTHER REGULATIONS

Main Principle: You should be aware generally of what policies and procedures Apply to you and abide by them

Provisions

- a. You should ensure that current policies, procedures, financial regulations, standing orders, delegations and other regulations relevant to your role are followed at all times. If employees feel that procedures could be improved, employees should discuss this with their line manager.
- b. Failure by employees to comply with policies and procedures may be construed as gross misconduct and will be investigated under the disciplinary procedure, for Board/Committee members it may be construed as a breach of the service agreement and/or Constitution.

G. HEALTH AND SAFETY

Main Principle: Your conduct must not endanger the health, safety or security of yourself or others

Provisions

- a. You should comply with LHP health and safety policy and procedures at all times.
- b. You have a responsibility to ensure that your conduct does not endanger the health or safety of yourself or other employees, visitors, tenants, leaseholders, customers of LHP or contractors.
- c. Employees should bring to the attention of their line manager and health and safety representative, any circumstances which might have health and safety implications.

H. DRESS CODE, APPEARANCE AND IDENTITY BADGES

Main Principle You should maintain required personal standards appropriate to the occasion whilst undertaking your work or role for LHP

Provisions

- a. You are expected to attend work or carry out your role dressed in a manner appropriate for your duties.
- b. You are required, when relevant, to wear uniforms and health and safety clothing provided for the proper and safe performance of your duties.
- c. Whilst at work employees' dress and general appearance should be clean, tidy and personal hygiene of an acceptable standard consistent with the professional image which LHP seeks to project.

- d. In order to provide consistency and security you are required to display a photo identity card at all times while at work or on LHP business.

I. ALCOHOL, DRUG/SUBSTANCE ABUSE AND SMOKING AT WORK

Main Principle: LHP expects you to be fit for conduct of your duties without any adverse impairment which affects you or others

Provisions

- a. Alcohol, drugs or substance abuse impairs judgement and you can put yourself, your work colleagues and members of the public at risk if you undertake your duties whilst under the influence of drink and/or drugs and/or dangerous substances. Refer to the alcohol and substance misuse policy.
- b. LHP wishes to ensure staff members and other users of Company facilities are protected from the adverse effects of tobacco smoke. You must comply with the Smoking at work policy.

J. PROPERTY AND ASSETS

Main Principle You should act as custodians of LHP property and not take personal advantage.

Provisions

- a. You are expected to take reasonable measures to protect LHP's property and assets from theft, damage or misuse.
- b. You should not use LHP's equipment or any other resource for personal use unless this has been authorised by your line manager if an employee or the Chief Executive for Board and Involved Residents.
- c. The copyright in any written material produced by an employee in the course of their employment shall remain the property of LHP.

K. INFORMATION AND COMMUNICATION TECHNOLOGY

Main Principle You should respect and not take advantage or misuse LHP's IT facilities

Provisions

- a. You must not do anything which would risk the integrity of LHP's information and communications systems. This would include the use of unauthorised or unlicensed software on LHP's system.

- b. Employees are referred in particular to LHP's ICT Acceptable use and Mobile phone/Device policies. It may be a disciplinary offence to act in breach of those policies and their supporting procedures.
- c. All software or disks incorporated onto LHP's system must be virus checked and approved by LHP IT department.
- d. You must not copy software products licensed to LHP.
- e. You may reasonably use landline telephones for personal circumstances. The cost of personal calls using mobile phones may be recharged. Care should be taken to only use mobile telephones when necessary. The use of telephony may be monitored to ensure appropriate use and to identify any necessary charges.

L. PROCUREMENT

Main Principle You must follow the procedures set out in LHP procurement rules to ensure VFM and fair and equal competition

Provisions

Where you are involved in decisions relating to buying goods or services on behalf of LHP you should ensure that:

- a. Decisions provide the best value for money
- b. Decisions are taken objectively and without favour to any particular supplier or contractor
- c. Competition between contractors/suppliers is fair and open
- d. Appropriate procedures are followed e.g. using an approved suppliers list or following tendering procedures.
- e. Before committing LHP to a contract process internal advice is sought from the procurement team
- f. Where you or a close relative wish to employ one of LHP's approved contractors/consultants to carry out work or provide services the employees should first lodge with LHP an accurate description of the work/services to be provided and the cost.
- g. Details of the use of LHP approved contractors/consultants will be recorded and maintained for this purpose.
- h. You should not accept or offer any payment or gift from or to another party to obtain or retain business or an advantage in the conduct of business as this could be construed as bribery under the Bribery Act 2010.

M. CORRUPTION AND FRAUD

Main Principle LHP has a zero tolerance of fraud and corruption and you must be alert to and report any concerns

Provisions

- a. You must be aware that it is a serious criminal and/or disciplinary offence to corruptly receive any gift, loan, fee, reward or other advantage in return for doing (or not doing) anything or showing favours to any person or organisation.
- b. You should only use LHP's monies and assets for their intended and lawful purposes.
- c. If you are aware of potentially corrupt or fraudulent activities of other employees, they have a duty to report this in accordance with the Anti-Fraud and Corruption Policy.
- d. LHP's policy is to report all cases of fraud to the police.
- e. Corrupt or fraudulent activities in excess of £5k will be reported to the Regulator, the Chief Executive and the Chair of the Audit and Risk Committee.

N. GIFTS AND HOSPITALITY

Main Principle You must not seek unauthorised gifts or hospitality from third parties which might be viewed as compromising your judgement or integrity or place you under an obligation

Provisions

- a. You must comply with the law and the Probity policy in relation to the giving and receiving of gifts and hospitality.
- b. You must not seek gifts or hospitality or other benefits.
- c. If offered gifts or hospitality, you should decline or prior approval should be sought for their acceptance. The only exceptions are gifts of token value or modest hospitality given in connection to normal work meetings. When declining hospitality, employees should be courteous but let the person making the offer know that all employees are bound by the terms in the code of conduct.
- d. Employees must not enter into any personal financial transactions with customers, including the taking or offering of loans, buying or selling of goods unless a specific permission is given by a senior member of staff.

O. CONFLICTS OF INTEREST

Main Principle You should take all reasonable steps to ensure that no undeclared conflict arises between your duties and your personal interests, financial or otherwise.

Provisions

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.

- a. You must comply with LHP'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.
- b. You must ensure that all of your declarations are accurate and up to date.
- c. Recruitment and selection procedures must be complied with especially when relating to the application for employment from members of staff, board members, involved residents or others who are related or closely connected.
- d. 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.
- e. You should declare an interest if you or a relative or person closely connected to you is, or applies to become, a tenant, leaseholder or licensee of LHP premises. In such cases you should not deal with any matter relating to that application or interest as part of your work or role.
- f. You must not be involved in the appointment of a contractor or supplier where they are related, or closely connected, to an organisation or individual applying or tendering for, a contract. You must not be involved in establishing the terms of a contract, or its ongoing monitoring or management, where you are related, or closely connected, to the contractor or supplier.
- g. Except where specifically permitted, you must normally avoid using LHP's contractors and suppliers for private purposes. Where this is unavoidable, you must not receive a favourable service as a result of their connection to LHP. 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 employees and the contractor as a result of their relationship to LHP.
- h. 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.

P. RELATIONSHIPS WITH PRESS AND MEDIA

Main Principle Unauthorised media communications can damage LHP's reputation and breach confidentiality rules.

Provisions

- a. You must not, without permission, pass or distribute to the press or media any information or materials relating to LHP.
- b. Similarly you must not correspond with the media or write media articles about LHP and its activities, or write letters or articles in your formal capacity as an employee or representative of LHP without prior permission. Media correspondence can be sent in a personal capacity but should not be in conflict with LHP's interests or purport to be representative of the organisation's view, or refer to your position in LHP.
- c. You must not make comments or statements to the press except where authorised to do so. If approached by the media you should take details about the enquiry and pass it on to the relevant designated officer
- d. It is noted and accepted that Trade Union representatives do have authority to comment on employee relations matters, particularly in dispute situations providing it is made clear that the person is speaking as a trade union representative.

Q. MEETINGS

Main Principle Your conduct at meetings reflects on LHP reputation and standards. You must show respect for all

Provisions

- a. You act as an ambassador for LHP in meetings with third parties and bodies and should act accordingly
- b. You should be courteous to all other attendees by listening to all points of view and avoid interrupting others whilst speaking
- c. You must never become aggressive in behaviour and not use inappropriate language or act in a disruptive fashion
- d. You must not be impaired by alcohol, drugs or similar when attending meetings
- e. You must respect the position and authority of the Chair of the meeting, and send apologies if you are unable to attend.
- f. Board, Committee and resident members must share collective responsibility for decisions reached and act collegiately

R. REPRESENTING LHP

Main Principle In representing LHP at external events and in dealings with outside bodies you act as an ambassador for LHP and should promote its values, policies and objectives

Provisions

- a) You must not become involved in or be seen to endorse any activity that may bring LHP into disrepute. This includes illegal, immoral, racist or other discriminatory activity

S. LEARNING AND DEVELOPMENT

Main Principle To be effective in your role you should take responsibility for contributing fully in partnership with LHP for your learning and development needs

Provisions

- a. You should take an active part in LHP's induction and appraisal processes
- b. You should discuss and agree your personal training and development needs
- c. You should attend all learning and development training arranged for you or with others
- d. Where you have professional or specialist qualifications you should ensure that you keep your knowledge up to date

T. POSITION AS A RESIDENT

Main Principle As a resident of LHP property you should comply with your obligations and avoid reputational damage

Provisions

- a. Employees who are tenants, leaseholders or licencees of LHP are expected to keep up to date with their rent or other due payments. LHP reserves the right to make deductions from an employee's salary if they fall into arrears with their rent or other payments. Employees should also comply with the terms and conditions of their tenancy, lease or licence and not be subject to action which leads to a court order by LHP against them such as an Anti-Social or other form of Injunction or Possession Order
- b. Board members who are tenants, leaseholders or hold licences in relation to LHP premises must avoid rent arrears and any other court orders relating to breach of the terms of their occupation (see Rules)

U. REPORTING CONCERNS

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

Provision

- a. If you are aware of potentially dishonest or fraudulent activity, or material breaches of this code by board members, staff or others you must report it to the appropriate senior person within LHP. The reporting concerns policy gives further information.
- b. If you believe that you are being required to act in a way which conflicts with this code, they must report it to the appropriate senior person within LHP.
- c. You must not be subject to victimisation for using or intending to use or is suspected of having used LHP's confidential raising concerns policy to report the misconduct or alleged misconduct of others.

You should be familiar with this policy to avoid any situation arising whereby you may be put in a position to bring LHP into disrepute