

CODE OF CONDUCT

2022-2025

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Policy Links:	LHP Rules Staff terms and conditions including their contracts of employment Board Members' services agreements Standing Orders – inc Scheme(s) of delegation / and financial regulations Probity Policy Whistleblowing Policy Procurement Standing Orders and guidelines Anti-Fraud and Corruption Policy Anti-Bribery Policy Regulatory Standards Legislation Code of Governance Disciplinary Procedures	

Brief Policy Summary:

This Code sets standards of conduct for colleagues to maintain the good reputation of Lincolnshire Housing Partnership (LHP) and social housing.

All colleagues need to apply good judgement even where the Code does not contain specific requirements. It is always important to consider how any action taken or decision made aligns with LHP's purpose and values, and what impact it may have upon customers and reputation.

The Code is written on the assumption that colleagues will comply with all legal and regulatory requirements relevant to this Code and with all LHP's policies, procedures, and employment contracts.

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PART 1: Acting in the best interests of the housing association and its residents

You have a responsibility to discharge your role in line with the purposes and values of the housing association.

1. Meeting your responsibilities

The principle - You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of LHP and for the delivery of its strategic objectives.

Expected of all

- 1.1 You must always try to fulfil the requirements of your role to the best of your ability. If any circumstances arise that limit your ability to meet your responsibilities, you must raise this through the appropriate channels.
- 1.2 In carrying out your role, you must always seek to further the housing association's strategic objectives, reflecting LHP's desired culture.
- 1.3 You must not act in a way that discriminates against, or unjustifiably favours, particular individuals, groups, or interests, including on the basis of any protected characteristics they may have.
- 1.4 You must consider the impact of your actions on the safety and wellbeing of residents.

Expected of board members

- 1.5 You must respect the principle of collective decision-making and corporate responsibility.
- 1.6 You must ensure that you declare to LHP any relevant personal relationships, employment, and other appointments you hold, and that these do not interfere with your ability to perform or conflict with your role as a board member.

Expected of staff members

1.7 You must consult your manager before taking any other paid or voluntary work that may interfere with your existing job, or conflict with terms set out in your contract of employment.

2. Representing LHP

The principle - In representing the housing association in any capacity, including at external events, in dealings with outside bodies and on social media, you are an ambassador for the housing association and must uphold and promote its values, objectives and policies.

Expected of all

2.1 In representing LHP, you must act in accordance with its values, policies, and goals.

- 2.2 You must not conduct yourself in a manner that could reasonably be regarded as bringing LHP into disrepute.
- 2.3 You must not make derogatory, false, or otherwise damaging comments, in person or through any medium, about LHP or any person, service or organisation connected with it.
- 2.4 You must not seek to officially represent the views or position of LHP without prior authority.
- 2.5 You must adhere to LHP's policies in the use of email, intranet and internet services including social media.
- 2.6 When representing LHP through any medium, including social media, you must at all times act with professionalism.
- 2.7 Where any personal social media accounts refer to your role with LHP, you must make it clear in what capacity you are communicating.
- 2.8 If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect LHP, you must obtain prior consent. Such consent must not be unreasonably withheld unless your activity poses a material risk to the association.

Expected of board members

2.9 Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or long- standing, and in the opinion of the board cannot be managed appropriately.

PART 2: Behaving with integrity

The reputation and good name of the housing association depends on compliance with this Code, and with the laws, policies, and procedures that it refers to. The integrity of those involved needs to be beyond doubt and seen so to be.

3. Conflicts of interests

The principle - You must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between your duties to the association and your personal interests, other duties, and relationships. Expected of all

- 3.1 You must formally declare to the housing association, at the earliest opportunity, any interests which may, or may be perceived to or may in the future, conflict with the duties of your role.
- 3.2 You must declare any known relationship to a person applying for or performing a role within the housing association and must not be involved in their appointment, performance management or reward.

- 3.3 You must declare any known relationship to a resident, potential resident, or other customer of the association. You must not be involved in decisions relating to their relationship with the housing association or seek or accept preferential treatment for them.
- 3.4 You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to the association and must not be involved in their appointment, performance management or reward.
- 3.5 Except where specifically permitted, as set out in the housing association's relevant policy, you must avoid using its contractors and suppliers for private purposes.
- 3.6 You must not use, or attempt to use, your position to promote personal interests or those of any connected person, business, or other organisation for personal gain.

Expected of board members

3.7 Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or long- standing, and in the opinion of the board cannot be managed appropriately.

4. Bribery, gifts, and hospitality

The principle - In your role with the housing association, you must not offer, seek, or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisations. You must not seek or accept preferential treatment in the provision of benefits such as housing accommodation or employment.

Expected of all

- 4.1 You must not solicit or seek gifts or hospitality or other benefits.
- 4.2 Any gifts or hospitality offered to or by you must be either declared or declined according to LHP's policies.
- 4.3 If you are offered a bribe, hospitality, or a gift, which is or may be in return for expected preferential treatment, you must decline and declare this immediately to the appropriate person.

5. Funds, resources, and personal benefit

The principle - You must not misuse the housing association's funds or resources or seek preferential treatment for your own personal benefit.

Expected of all

5.1 You must ensure that the housing association's funds and resources are used properly and efficiently.

- 5.2 Your procurement decisions must be guided by the housing association's policies and fairness in decision-making and in line with relevant law.
- 5.3 You must take all reasonable measures to protect the housing association's funds, resources, property and assets from fraud, theft, damage, and misuse.
- 5.4 If you claim reimbursement for any expenses, you must do so in line with the housing association's policies and procedures.

6. Confidentiality

The principle - You must process information in accordance with the law and the housing association's policies and procedures.

Expected of all

- 6.1 You must not disclose, without the required permission and authority, any personal data about tenants, customers, staff, or colleagues.
- 6.2 You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left the housing association or stepped down from your position.
- 6.3 You must not, without authority, pass or distribute to the press or media or any other external recipient(s) any unpublished information or materials relating to the association, unless you are doing so in accordance with the housing association's whistleblowing policy and procedure.
- 6.4 You must not prevent another person from gaining access to information to which they are entitled to by law.

7. Reporting concerns

The principle - You must report to the appropriate person within the association any reasonable suspicions you have about wrongdoing in line with your association's relevant policies and procedures.

Expected of all

- 7.1 If you have a concern about wrongdoing, you must immediately report it via the appropriate internal channel or external body. This includes becoming aware of potentially dishonest or fraudulent activity, and material breaches of this Code or relevant legislation including health and safety.
- 7.2 If you believe that you are being required to act in a way which conflicts with this Code or legislation, you must immediately report it via the appropriate channel.
- 7.3 You must not victimise or disadvantage any person who uses or intends to use the housing association's confidential reporting (whistleblowing) procedures to report actual or alleged wrongdoing.

PART III: Conducting yourself professionally and treating others well

Professionalism, consideration and respect for others, and a commitment to the principles of equality, diversity, and inclusion, are fundamental to the delivery of social purpose.

8. Respect for others

The principle - You must treat all others with respect and consideration.

Expected of all

- 8.1 You must treat everyone you meet in the performance of your role with equal respect, care, and consideration.
- 8.2 You must show respect for individuals' chosen identities.
- 8.3 You must promote, through your own behaviours, an organisational culture that is welcoming, accepting, and accommodating to people of all backgrounds, cultures, and personal and protected characteristics.
- 8.4 You must not harass, bully, or attempt to intimidate any person, or use threatening or aggressive behaviour or other discriminatory behaviours. You must seek to avoid microaggressions in your speech and behaviour.
- 8.5 You must not display materials in your workplace or use language in the performance of your role which other people might reasonably find offensive.
- 8.6 You must report through appropriate channels any instances of unfair or unequal treatment in the workplace and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and respecting confidentiality.

9. Working with residents and other customers

The principle - You must be professional, fair, and courteous in all your dealings with residents and other customers.

Expected of all

- 9.1 You must seek and value views from residents and other customers when making decisions that will affect them.
- 9.2 You must not allow any personal relationship with a resident or other customer to influence how you discharge your role and responsibilities.
- 9.3 You must not give personal gifts or loans of money to, or receive personal loans or gifts of money from, residents or other customers.
- 9.4 You must handle residents' and other customers' money only where necessary and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with the association's financial policies, procedures, and controls to ensure appropriate handling of all funds.
- 9.5 You must not invite or influence a resident or other customer unless they are a person who you are closely connected to, to make a will or trust under which you are named as executor, trustee, or beneficiary.

10. Professional relationships

The principle - Board members, staff and involved residents must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.

Expected of all

10.1 You must not ask or encourage the commitment of wrongdoing, including any breach of this Code.

Expected of board members

- 10.2 Your relationships with staff and involved tenants must be constructive and professional.
- 10.3 You must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies, and objectives of the housing association.

Expected of board members and involved residents

- 10.4 Where it is necessary to raise issues of staff, board, or contractor performance, these must be raised constructively and through the appropriate channels.
- 10.5 You must not undermine or appear to undermine the authority of a senior officer in his or her dealings with a more junior member of staff.
- 10.6 You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with members of staff.
- 10.7 Unless you have specific and, where practicable, written delegated authority to do so, you must not individually give instruction or direction to any member of staff or contractor.

Expected of staff members

- 10.8 You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding, in a professional setting, inappropriate personal familiarity with board members and involved residents.
- 10.9 You must not use informal channels to lobby or influence board members or involved residents on matters of the housing association's business.
- 10.10 You must not knowingly mislead the board or any of the housing association's committees or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.

11. Learning and development

The principle - In partnership with the housing association, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

Expected of all

- 11.1 You must play an active part in the housing association's supervision and performance appraisal processes as applying to you.
- 11.2 You must offer open and constructive feedback to others and invite feedback about your own performance.
- 11.3 You must make your personal training and development needs relevant to your role known to the association.
- 11.4 Unless there are exceptional reasons, you must attend learning and development events as required.

Expected of board members

11.5 You must keep your knowledge up to date in those areas in which you are a specialist, as well as keeping abreast of any matters relating to your association and the wider housing sector.

PART IV: Protecting yourself, other people, and the environment

You have a responsibility while on the housing association's business to protect your own health, safety, security, and wellbeing and that of others, and to minimise harmful environmental impacts.

12. Health, safety, and security

The principle - Your conduct, actions and decision making must promote the health, safety, security and wellbeing of yourself or others.

Expected of all

- 12.1 You must not knowingly put your own or others' health, safety, security, or wellbeing unnecessarily at risk.
- 12.2 If you have any concerns about the health, safety, security, or wellbeing of yourself, another individual or a group of individuals connected with the association, you must report this immediately through the appropriate channels.

13. Protecting the environment

The principle - Within your role at the association, you must strive to avoid or reduce possible negative environmental impacts.

Expected of all

13.1 In carrying out actions or making decisions in the performance of your role, you must consider the environmental impact of your decisions and where you are able, seek to achieve positive environmental outcomes.

Expected of board members

13.2 You should consider the long-term environmental impact of your decisions.

Terminology used in this Code

Board Includes any board of management, management committee, board of trustees, and all similar governing bodies however named.

Board member - Includes all members of governing bodies whether they are formally known as non- executive directors, trustees, board members, management committee members, etc. It includes co-optees and any other nominees, whether they enjoy voting rights, and all members of sub-committees who are not also members of the main governing body.

Contractors - Includes those other than board members, staff and involved residents who are directly involved in delivering the housing association's business activities. This includes contractors, sub- contractors, consultants, and agents.

Housing association - Refers to all organisations that are members of the National Housing Federation. This includes other types of housing organisation – such as charities, co-operatives, and companies – that are members of the National Housing Federation.

Involved resident - Includes residents and other customers (as defined below) who are formally involved in delivering, or scrutinising, the housing association's business activities. It will be up to each association to decide which involved residents this Code applies to; we would recommend it only applies to those who exercise a level of seniority within the association, for example, those who attend board or committee meetings or are members of a scrutiny panel. Some involved resident groups may instead operate to their own Code of Conduct.

Known relationship - For the purposes of this code means related parties and lose connections, it is not envisaged that relationships with acquaintances should be covered by this term.

Microaggression - Is a term used for brief and commonplace verbal, behavioural or environmental slights that may communicate hostile, derogatory, or negative attitudes towards certain groups of people.

People with whom you are closely connected - In broad terms, means your family, relatives, or business partners as well as businesses in which you have an interest through ownership or influence. The term includes your spouse or unmarried partner or civil partner, children, siblings, grandchildren, and grandparents.

Residents and other customers - Includes residents, tenants, leaseholders, shared owners, and users of other services provided by the housing association.

Staff member and staff - Includes the housing association's employees and any other persons fulfilling the role of a paid employee, such as those deemed to be workers, interim placements, or those on secondment from another organisation.

EQUALITY IMPACT ASSESSMENT

Insert Name of Policy						
Provide a summary of the aims and main activities of the initiative (bullet points):						
This Code sets standards of conduct for colleagues to maintain the good reputation of LHP and social housing.						
Completed By:	Assistant Director of Governance and Regulation	Date:	07/06/22			

Guidelines: Things to consider

• Where a negative (i.e., adverse) impact is identified, it may be appropriate to make a full EIA (see Stage 2), or, as important, take early action to redress this – e.g., by abandoning or modifying the initiative. NB If the initiative contravenes equality legislation, it must be abandoned or modified.

• Where an initiative has a positive impact on groups/community relations, the EIA should make this explicit, to enable the outcomes to be monitored over its lifespan.

• Where there is a positive impact on particular groups, does this mean there could be an adverse impact on others, and if so, can this be justified? - e.g. Are there other existing or planned initiatives which redress this?

EQUALITY IMPACT ASSESSMENT

• It may not be possible to provide detailed answers to some of these questions at the start of the initiative. The EIA may identify a lack of relevant data, and that data-gathering is a specific action required to inform the initiative as it develops, and to form part of a continuing evaluation and review process.

• It is envisaged that it will be rare for full impact assessments to be required. Usually, where there are particular problems identified in the screening stage, it is envisaged that changing the approach at this stage, and/or setting up a monitoring/evaluation system to review a policy's impact over time will tackle the problem.

STAGE 1: SCREENING

This stage establishes whether a proposed initiative will have an impact from an equality perspective on any particular group of people or community – i.e., on the grounds of race, religion/faith/belief, gender (including transgender), sexual orientation, age, disability, or whether it is "equality neutral" (i.e., have no effect either positive or negative).

Q 1. Who will benefit from this initiative? Is there likely to be a positive impact on specific groups/communities (whether they are the intended beneficiaries), and if so, how? Or is it clear at this stage that it will be equality 'neutral' i.e., will have no effect on any group? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

It is expected that this policy will be equality neutral – as applies equally to all colleagues.

Q 2. Is there likely to be an adverse impact on one or more minority/under-represented or community group because of this initiative? If so, who may be affected and why: Or is it clear at this stage that it will be equality 'neutral'? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

EQUALITY IMPACT ASSESSMENT

It is expected that this policy will be equality neutral.

Q 3. Is there sufficient data on the target beneficiary groups/communities? Are any of these groups under or overrepresented? Do they have access to the same resources? What are your sources of data and are there any gaps? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

LHP collects diversity data on its colleagues and compares the diversity profile to the profile of the communities within which LHP serves (ONS data).

Q 4. Outsourced services – if the initiative is partly or wholly provided by external organisations / agencies, please list any arrangements you plan to ensure that they promote equality and diversity. Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

NA

Q 5. Is the impact of the initiative (whether positive or negative) significant enough to warrant a full impact assessment – see guidance? If not, will there be monitoring and review to assess the level of impact over a period? Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality

No

Q 6. <u>To be completed at six monthly review Detail</u> actions taken to assess the level of impact over a period, or to address any gaps in data. Please consider all aspect of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality