

Code of Conduct

for Golden Lane Housing

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Introduction

It is vital for the reputation of Golden Lane Housing that everyone who works for us, or on our behalf, is held to the highest standards of conduct

Application of this Code

The Code cannot aim to cover every situation in which people may find themselves as they perform their roles.

You 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 the housing association's purpose and values, and what impact it may have upon tenants and reputation.

Compliance with this Code

The Code covers the conduct of individuals including colleagues and Board Members.

Legal requirements and policies

The Code is written on the assumption that those using it will comply with all legal and regulatory requirements relevant to this Code and with all of Golden Lane Housing's policies, procedures and employment contracts.

Users of this Code must have access to all relevant policies and procedures, for example, on an intranet. They must also be covered in the induction of new colleagues.

Who does the Code apply to?

The Code sets standards of conduct for colleagues and board members and may include certain volunteers, involved tenants and contractors depending on their level of involvement.

Responsibilities

The Board of Golden Lane Housing is ultimately responsible for the actions, policies and work of the organisation. It is their responsibility to make sure that all those concerned can comply with this Code.

The Board and senior colleagues have a responsibility to set an appropriate framework of policies, delegations and procedures. A culture must be promoted which enables and supports all individuals to meet their responsibilities, as set out in this Code, and deliver the best possible service for tenants and customers.

Everyone is entitled to ask for further information or guidance they may need about the application or detail of this Code.

How the Code is structured

The Code is split into four main parts, each embodying a key theme arising from the mission and values of Golden Lane Housing.

Each part of the Code comprises a set of principles and detailed expectations. Where its requirements apply differently to different groups (board members, involved tenants and colleagues) we use subheadings within the relevant section to distinguish them.

The four parts:

ONE

Acting in the best interests of Golden Lane Housing, its tenants and customers:

you have a responsibility to carry out your role in line with the social purposes of the association.

TWO

Behaving with integrity:

the reputation and good name of Golden Lane Housing depends in part 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.

THREE

Conducting yourself professionally and treating others well:

professionalism, consideration and respect for others, and a commitment to the principles of equity, diversity and inclusion, are fundamental to the delivery of social purpose

FOUR

Protecting yourself, others and the environment:

you have a responsibility while on Golden Lane Housing business to protect your own health, safety, security and wellbeing and that of others, and, where reasonable, to make the most positive possible environmental impact.

Terminology used in this Code

'Board'

The Board and any Committee.

'Board member'

All members and trainee members it includes co-optees and any other nominees, whether or not 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, colleagues and involved tenants who are directly involved in delivering Golden Lane Housing's business activities. This includes contractors, sub- contractors, consultants and agents.

'Housing association'

Refers organisations like Golden Lane Housing.

'Involved tenant'

Tenants and other customers who are formally involved in delivering, or scrutinising, the housing association's business activities. It is up to Golden Lane Housing to decide which involved tenants this Code applies to; usually those who exercise a level of seniority within the association. Some involved tenant groups may instead operate to their own Code of Conduct.

'Known relationship'

For the purposes of this Code means related parties and close 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.

'Tenants and other customers'

Tenants, shared owners and users of other services provided by Golden Lane Housing.

'Colleague'

Golden Lane Housing'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.

PART I: Acting in the best interests of Golden Lane Housing and its tenants

You have a responsibility to discharge your role in line with the purpose and values of Golden Lane Housing.

A. 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 Golden Lane Housing and for the delivery of its strategic objectives.

Expected of all

- A1 You must always try to fulfil the requirements of your role to the best of your ability and adhere to the values of Golden Lane Housing. If any circumstances arise that limit your ability to meet your responsibilities, you must raise this through the appropriate channels.
- **A2** In carrying out your role, you must always seek to further the housing association's strategic objectives, reflecting the housing association's desired culture.
- A3 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.
- **A4** You must consider the impact of your actions on the safety and wellbeing of tenants.

Expected of board members

- **A5** You must respect the principle of collective decision-making and corporate responsibility.
- A6 You must ensure that you declare to Golden Lane Housing 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 colleagues

A7 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.

B. Representing Golden Lane Housing

The principle

In representing Golden Lane Housing in any capacity, including at external events, in dealings with outside bodies and on social media, you are an ambassador for Golden Lane Housing and must uphold and promote its values, objectives and policies.

Expected of all

- **B1** In representing the housing association, you must act in accordance with its values, policies and goals.
- **B2** You must not conduct yourself in a manner that could reasonably be regarded as bringing Golden Lane Housing into disrepute.
- B3 You must not make derogatory, false or otherwise damaging comments, in person or through any medium, about Golden Lane Housing or any person, service or organisation connected with it.
- **B4** You must not seek to officially represent the views or position of Golden Lane Housing without prior authority.
- **B5** You must adhere to the housing association's policies in the use of email, intranet and internet services including social media.

- B6 When representing Golden Lane Housing through any medium, including social media, you must at all times act with professionalism.
- **B7** Where any personal social media accounts refer to your role with the housing association, you must make it clear in what capacity you are communicating.
- B8 If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect the housing association, 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

B9 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 longstanding, and in the opinion of the board cannot be managed appropriately.

PART II: Behaving with integrity

The reputation and good name of Golden Lane Housing 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.

C. 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

- C1 You must formally declare to Golden Lane Housing, 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.
- C2 You must declare any known relationship to a person applying for or performing a role within Golden Lane Housing and must not be involved in their appointment, performance management or reward.
- C3 You must declare any known relationship to a tenant, potential tenant or other customer of the association. You must not be involved in decisions relating to their relationship with Golden Lane Housing or seek or accept preferential treatment for them.

- **C4** 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.
- C5 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.
- C6 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

C7 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 longstanding, and in the opinion of the board cannot be managed appropriately.

D. Bribery, gifts and hospitality

The principle

In your role with Golden Lane Housing, 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

- **D1** You must not solicit or seek gifts or hospitality or other benefits.
- **D2** Any gifts or hospitality offered to or by you must be either declared or declined according to your housing association's policies.
- D3 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.

E. Funds, resources and personal benefit

The principle

You must not misuse Golden Lane Housing's funds or resources, or seek preferential treatment for your own personal benefit.

- **E1** You must ensure that Golden Lane Housing's funds and resources are used properly and efficiently.
- **E2** Your procurement decisions must be guided Golden Lane Housing's and fairness in decision-making and in line with relevant law.

- **E3** You must take all reasonable measures to protect Golden Lane Housing's funds, resources, property and assets from fraud, theft, damage and misuse.
- **E4** If you claim reimbursement for any expenses you must do so in line with Golden Lane Housing's policies and procedures.

F. Confidentiality

The principle

You must process information in accordance with the law and Golden Lane Housing's policies and procedures.

Expected of all

- **F1** You must not disclose, without the required permission and authority, any personal data about tenants, customers, or colleagues.
- **F2** You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left Golden Lane Housing or stepped down from your position.
- F3 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 Golden Lane Housing's whistleblowing policy and procedure.
- **F4** You must not prevent another person from gaining access to information to which they are entitled to by law.

G. Reporting concerns

The principle

You must report to the appropriate person within Golden Lane Housing any reasonable suspicions you have about possible wrongdoing in line with Golden Lane Housing's relevant policies and procedures.

- G1 If you have a concern about possible 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.
- **G2** 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 an appropriate channel.
- **G3** 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 equity, diversity and inclusion, are fundamental to the delivery of social purpose.

H. Respect for others

The principle

You must treat all others with respect and consideration.

- **H1** You must treat everyone you meet in the performance of your role with equal respect, care and consideration.
- **H2** You must show respect for individuals' chosen identities.
- H3 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.

- H4 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.
- Wou must not display materials in your workplace or use language in the performance of your role which other people might reasonably find offensive.
- 46 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.

I. Working with tenants and other customers

The principle

You must be professional, fair and courteous in all your dealings with tenants and other customers.

- You must seek and value views from tenants and other customers when making decisions that will affect them.
- You must not allow any personal relationship with a resident or other customer to influence how you discharge your role and responsibilities.
- You must not give personal gifts or loans of money to, or receive personal loans or gifts of money from, tenants or other customers.

- You must handle tenants' and other customers' money only where absolutely 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 any and all funds.
- 15 You must not invite or influence a tenant 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.

J. Professional relationships

The principle

Board members, colleagues and involved tenants must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.

Expected of all

J1 You must not ask or encourage the commitment of wrongdoing, including any breach of this Code.

Expected of board members

- J2 Your relationships with colleagues and involved tenants must be constructive and professional.
- J3 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 tenants

- J4 Where it is necessary to raise issues of employee, board or contractor performance, these must be raised constructively and through the appropriate channels.
- J5 You must not undermine or appear to undermine the authority of a senior officer in his or her dealings with a more junior employees.

- J6 You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with employees.
- J7 Unless you have specific and, where practicable, written delegated authority to do so, you must not individually give instruction or direction to any employee or contractor.

Expected of colleagues

- J8 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 tenants.
- J9 You must not use informal channels to lobby or influence board members or involved tenants on matters of the housing association's business.
- J10 You must not knowingly mislead the board or any of Golden Lane Housing's committees or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.

K. Learning and development

The principle

In partnership with Golden Lane Housing, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

Expected of all

- **K1** You must play an active part in Golden Lane Housing's supervision and performance appraisal processes as applying to you.
- **K2** You must offer open and constructive feedback to others and invite feedback about your own performance.

- **K2** You must make your personal training and development needs relevant to your role known to the association.
- K3 Unless there are exceptional reasons, you must attend learning and development events as required.

Expected of board members

K4 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 Golden Lane Housing and the sector.

PART IV: Protecting yourself, other people and the environment

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

L. 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

L1 You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk.

L2 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.

M. Protecting the environment

The principle

Within your role at Golden Lane Housing, you must strive to avoid or reduce possible negative environmental impacts.

Expected of all

M1 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

M2 You should consider the long term environmental impact of your decision