

CODE OF CONDUCT FOR STAFF

APPROVED BY HHP BOARD:
19 November 2024
EFFECTIVE DATE:
November 2024



hebridean housing
partnership

TABLE OF CONTENTS

INTRODUCTION	2
HONESTY & INTEGRITY.....	4
OPENESS AND ACCOUNTABILITY	6
SELFLESSNESS, OBJECTIVITY AND LEADERSHIP	9
BREACH OF THE CODE.....	11
INTERPRETATIONS & ABBREVIATIONS.....	12
STATEMENT OF ACCEPTANCE	APPENDIX 1 13

INTRODUCTION

There are references throughout this Code of Conduct (the Code) to 'I' and 'you' which means the member of staff of HHP who has signed this Code. References to 'we' and 'our' mean HHP.

- 1.1 We attach the greatest importance to ensuring that high standards of behaviour are demonstrated by all of our people and in all of our activities.
- 1.2 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.
- 1.3 Our core value as a business is ***Integrity***. Our organisation is made up of individuals who either serve on the Board or are employees. For us to be a business of integrity we must hold each other accountable to this value.

"We hold each other accountable to be honest, fair, dependable and trustworthy in all our working relationships and do the right thing no matter who is watching."

Our supporting values are:

- Customer Focus
 - Equalities
 - Service Excellence
 - Sustainability
 - Teamwork
- 1.4 As a Registered Social Landlord (RSL), we are required by the Scottish Housing Regulator (SHR) to adopt and comply with an appropriate Code of Conduct. This Code is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations and EVH – Supporting Social Employers. The SHR has confirmed that this Code fully complies with its Regulatory Standards and their input during the production of this code is acknowledged.
 - 1.5 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 Acceptance' at the end) to confirm that you have read and understood the terms of the Code and you have a personal responsibility to uphold the requirements of this

Code. Once signed, your 'Statement of Acceptance' form must be returned to the P.A. where it will be held on your personnel file.

- 1.6 You must also ensure you are familiar with, and comply with, all of our policies.
- 1.7 If there are any aspects of this Code, or of any of the related policies, on which you are unclear, you must seek guidance from your line manager. Your line manager will also be able to give guidance where you are unsure how the Code or related policies apply in a particular situation.

Who the Code applies to

- 1.8 This Code of Conduct applies to everyone who works for us whether employed directly or otherwise.
- 1.9 A copy of this Code will be made available to every person that it applies to.

How the Code is structured

- 1.10 The Code is based on the Nolan Principles on Standards in Public Life which are recognised as defining good conduct for those who work for the public using public money.
- 1.11 We have defined three groups of principles as the basis for the Code:
 - a) Honesty and Integrity - section 2;
 - b) Openness and Accountability – section 3; and
 - c) Selflessness, Objectivity, Leadership - section 4.
- 1.12 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 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 at Appendix 1 which also outlines the implications for any breach of the code.

HONESTY & INTEGRITY

- 2 **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 & Hospitality

- 2.1 I will act, and ensure I am seen to act, wholly in the interests of our organisation, our tenants, other residents and other service users. I will ensure that I do not benefit improperly from my position.
- 2.2 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, influence or place me under an obligation to these individuals or organisations. I will comply with our Entitlements, Payments & Benefits Policy.

Prevention of Bribery

- 2.3 We must comply with anti-bribery legislation. I will comply with our anti-bribery and corruption policies. Our Anti-Corruption Policy Statement outlines our requirements in this respect.
- 2.4 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 and must comply with our policy on bribery. I am aware that offering, seeking or accepting bribes will result in disciplinary action and may also result in criminal prosecution.
- 2.5 I will report to our 2 Officer any instances of suspected bribery within the Partnership or any external organisation with which we have dealings.

Personal Benefit

- 2.6 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 Partnership or its contractors/suppliers: I will ensure that I can demonstrate this.
- 2.7 Where, in my personal/home life, I need a service from a contractor or supplier, if it causes no disadvantage or inconvenience I will avoid using someone off the approved

list. If, however, I need to use one of our contractors or suppliers, I will ensure that the guidance at Section 4 of our Entitlements. Payments and Benefits Policy is followed exactly. An up-to-date list of our contractors and suppliers forms part of our EPB Policy and is available on the Intranet.

- 2.8 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.

Section 3 of Appendix 2 defines what is meant by 'closely connected'.

Resources, Facilities and Premises

- 2.9 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.
- 2.10 I will comply with all of our relevant policies, including (but not exclusively) usage of internet and email, social media, health & safety, equalities, inclusion, human rights and diversity and dignity at work.
- 2.11 I will not undertake work for another organisation - or for any personal business - on HHP's premises nor use our resources or facilities for such a purpose, unless I first have specific permission from my Director.

Funds and Expenses

- 2.12 I recognise that HHP 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.
- 2.13 I will comply with our relevant policies when procuring goods/services and/or claiming expenses.

Tenants/Service Users and Money

- 2.14 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; or
 - Invite or influence them to make a will or trust under which I am named as executor, trustee or beneficiary.

General Responsibilities

- 2.15 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.

- 2.16 In presenting information I will take all reasonable steps to ensure that I set out the facts and relevant issues truthfully.
- 2.17 I will avoid any situation that could give rise to suspicion or suggest improper conduct. I will avoid conduct that is likely to bring the Partnership into disrepute or undermine its managerial integrities. This includes conduct taking place outside the immediate normal working environment, but connected to the Partnership, for example, Christmas parties or other social events.
- 2.18 I will inform my Manager if I am notified of any action by a professional body that is relevant to my role within HHP and/or which could impact HHP's reputation that I am or may be party to.

OPENESS AND ACCOUNTABILITY

- 3 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 within HHP any reasonable and honest suspicions you may have about possible wrongdoing.**

Declaring Interests

- 3.1 I recognise that HHP 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.
- 3.2 Where I 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 I know that someone to whom I am closely connected has such an interest, I will declare it promptly and record it in the Disclosure of Interest Register.

- 3.3 In cases where a letting may be granted to me or a close relative of mine, in accordance with the Allocations Policy and the Entitlements, Payment and Benefits for Board Members and Staff Policy, I understand the appropriate Senior Manager should prepare a report outlining the circumstances of the individual and that report should be submitted to the Partnership's Board of Management for approval. Any subsequent allocation will be recorded in the appropriate register.
- 3.4 I will keep my entry in the Disclosure of Interest Register complete, accurate and up to date. I understand the register is retained within the Corporate Filing System and is a public document so it may be accessed at any point for checking.

Handling Information

- 3.5 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 Communications Policy, Openness and Confidentiality Policy, Communication Tools Procedure, Data Protection Procedure, ICT Security Policy, ICT Strategy and Financial Regulations give further guidance.
- 3.6 I will respond to requests for information positively and must not prevent people or bodies from being provided with information that they are entitled to receive.
- 3.7 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

- 3.8 I will respect confidentiality and ensure that I will 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 HHP.
- 3.9 I understand, and will comply with, the requirement that the permission of the Senior Officer is required before confidential correspondence or documents are removed from the work premises.
- 3.10 I understand, and will comply with, the requirement that the organisation's mobile phones and tablets must always be password protected.
- 3.11 Unless specifically authorised to do so, I will not make comments or statements in public or to the media, or pass any documents or other information to the press or

media about us or our activities. If I am approached by the press or other media I will quickly pass the enquiry to the Chief Executive of the Partnership.

- 3.12 I will not publish any material or deliver any lecture or address any issues relating specifically to us or our activities without prior approval from the Chief Executive. This includes invitations to speak at conferences or external events.

Using Social Media

- 3.13 I will not disclose any private or confidential information relating to us, our customers, partners, suppliers, board members, or employees on any social networking sites, bulletin boards, blogs or similar. (See also 4.12 under "Upholding our reputation"). This applies whether I am posting under my own name or a pseudonym. I understand and will comply with the requirement that social media should not be accessed during working hours.

Using Personal Mobile Phones

- 3.14 Aside from using necessary work-related apps such as authenticators, I am aware that the use of personal mobile phones should be limited during work hours to minimise the impact to my work and that of my colleagues. Where possible, I will take any personal calls in the breakroom to minimise disruption to colleagues.

Reporting Concerns

- 3.15 If I become aware of any actual or potential fraud, corruption or wrongdoing, or breaches of this Code, I will report this to my line manager or to the Chief Executive. I am aware that I may do so on a confidential basis. Our Whistleblowing Policy gives further information.
- 3.16 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.

SELFLESSNESS, OBJECTIVITY AND LEADERSHIP

- 4 You must act in the best interests of HHP at all times within the framework set by the Partnership, working to promote our aims and objectives, upholding our values and setting a good example by your own conduct.**

Fulfilling Your Role

- 4.1 I will comply with my terms of appointment and our policies and procedures relating to my role.
- 4.2 I will fulfil my duties responsibly, exercising reasonable skill and care and acting at all times in our best interests and that of our tenants and other service users. I will always aim to put the needs of our tenants and service users first in my day to day work, within the framework of our policies and procedures.
- 4.3 I will uphold and promote our aims and objectives and in accordance with the relevant legal and regulatory requirements (including those, as applicable, of the Scottish Housing Regulator, the Office of the Scottish Charity Regulator, the Financial Conduct Authority and the Care Inspectorate). If I am in doubt as to the legal and regulatory requirements that are relevant to my role, I will seek guidance from my line manager.
- 4.4 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 my right to be an active citizen or, for example, to be an active trade unionist.
- 4.5 I will take direction from my line manager, other senior managers, my Director, and the Board, and exercise responsibly any authority that comes with my role as a staff member.
- 4.6 I will not seek to use informal channels to influence the Board regarding decisions to be made about the conduct of our business.
- 4.7 I will consult with and seek approval from my Director before taking on any outside work or any position (paid or unpaid) that will in any way impact on my role with HHP. I recognise that any such work or position must not interfere with my existing job or conflict with HHP's interests.

- 4.8 I will participate in any necessary training and play an active 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

- 4.9 I will maintain high standards of professionalism, fairness and courtesy in all my dealings with tenants and other service users.
- 4.10 I will not allow any personal relationship with a tenant or other service user to conflict with the conduct of my role and responsibilities.
- 4.11 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

- 4.12 I will not act in a way that could reasonably be regarded as bringing HHP into disrepute. This would include publicly making any derogatory comments about the organisation, its staff, Board members, service users, partners and anyone that we are doing business with. I will discuss any grievance, concern or potential wrongdoing that I have relating to a member of staff or of the Board with my line manager or Director.
- 4.13 I will always be a positive ambassador for HHP and our work, especially when attending events as a member of our staff or in dealing with outside bodies.

Showing Respect for Others

- 4.14 I will always treat others with respect at all times. I will consider and respect the views of others.
- 4.15 I will adhere to both the letter and the spirit of our Equality and Diversity policy. See also 2.21 above about the need to avoid discrimination of any kind.
- 4.16 I will always conduct myself in a courteous and professional manner. I will not, by my actions or behaviour, cause distress, alarm or offence.
- 4.17 I will not harass, bully or attempt to intimidate any person.

- 4.18 I will take care when displaying materials in the office and ensure that these would not reasonably cause offence to my colleagues. If in doubt, I will consult my line manager before displaying any materials.
- 4.19 I will ensure that the language I use would not reasonably cause offence to my colleagues, tenants or other members of the public I come into contact with in my capacity as an HHP employee.
- 4.20 When attending meetings, I will be courteous to all attendees and respect the position of the meeting chair or convenor.

BREACH OF THE CODE

- 5.1 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 the Code, or have witnessed or become aware of a potential breach by another staff member, you should immediately bring the matter to the attention of your line manager or Director.
- 5.2 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.
- 5.3 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
- 5.4 You must sign the below statement of acceptance once you have read and understood this Code and its requirements.

INTERPRETATIONS & ABBREVIATIONS

The following interpretation and abbreviations are used in this policy:

Word	Interpretation
HHP or Partnership	Hebridean Housing Partnership
Board	Means the Board of the Hebridean Housing Partnership
Board Members	All Members of the Board including co-opted Members
Close Connection	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, for example, spouses and partners, children (included adopted and step-children), parents and parents-in-law, grandparents, grandchildren and siblings
Chair	The Chairperson of the Hebridean Housing Partnership or the Chair of a meeting.
Compliance Officer	The officer responsible for supporting the Board in the implementation of our external and internal controls.
Contractor	A person or business with which the Partnership has a business contract.
EVH	Employers in Voluntary Housing
Senior Officer	The Chief Executive of the Hebridean Housing Partnership.
SHR	Scottish Housing Regulator
Supplier	A person or business that supplies the Partnership with goods or services for a fee.
All references to the masculine gender in this policy shall read as equally applicable to the feminine gender	



HHP is a registered society under the Co-operative and Community Benefit Societies Act 2014, Registered Number: 2644R(S), Registered Office: Creed Court, Gleann Seileach Business Park, Willowglen Road, Stornoway, Isle of Lewis HS1 2QP. It is a charity registered in Scotland, Charity Number: SCO35767, registered as Registered Social Landlord with the Scottish Housing Regulator, Registration Number: 359 and registered as a Property Factor, Registration Number: PF000183

STATEMENT OF ACCEPTANCE

APPENDIX 1

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 Hebridean Housing Partnership Ltd.

I understand that the Code of Conduct applies regardless of where or how I am working and this 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 HHP's disciplinary procedures and could ultimately result in my dismissal.

Signed _____

Date _____

This Code of Conduct was adopted by the Board on 19 November 2024, subject to a period of consultation with staff, and comments were incorporated where appropriate. It will be further reviewed not later than November 2027.

The Board will receive an annual report on the working of this Code.