



supporting
social
employers

Model Code of Conduct for Staff



Contents

Introduction	p2-3
Who the Code applies to	p2
How the Code is structured	p3
The Code of Conduct	p4-11
A. Honesty and Integrity	p4-6
Gifts and hospitality	p4
Prevention of bribery	p4
Personal benefit	p4
Resources, facilities and premises	p5
Funds and expenses	p5
Tenants/service users and money	p5
General responsibilities	p6
B. Openness and Accountability	p7-8
Declaring interests	p7
Handling information	p7
Respecting confidentiality	p7-8
Using social media	p8
Reporting concerns	p8
C. Selflessness, Objectivity, Leadership	p9-11
Fulfilling your role	p9-10
Working with tenants and other service users	p10
Upholding our reputation	p10
Showing respect for others	p10-11
Breach of the Code	p12
Statement of acceptance	p12
Appendix 1: Declaring and managing personal interests	p13-16

Introduction

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

1. KEY attaches the greatest importance to ensuring that high standards of behaviour are demonstrated by all of our people and in all of our activities.
2. This Code of Conduct sets out the standards of conduct required of you as a member of our staff.
3. As a Registered Social Landlord (RSL), we are required to adopt and comply with an appropriate Code of Conduct¹. This Code is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations and EVH² – Supporting Social Employers. The Scottish Housing Regulator (SHR) has confirmed that this Code fully complies with its Regulatory Standards and their input during the production of this code is acknowledged
4. You must make yourself familiar with the terms of this Code and act in accordance with its requirements at all times. You are required to sign the Code (in the 'Statement of the Acceptance' 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.
5. You must also ensure you are familiar with, and comply with all of our policies.
6. If there are any aspects of this Code, or of any of the related policies, on which you are unclear, you must seek guidance from your manager. Your manager, or Head of HR, 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

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

¹ Scottish Housing Regulator, April 2012, [Standards of Governance and Financial Management](#): Standard 5 and guidance 5.24.

² Employers in Voluntary Housing

How the Code is structured

9. The Code is based on the Nolan Principles on Standards in Public Life³ which are recognised as defining good conduct for those who work for the public using public money.
10. We have defined three groups of principles as the basis for the Code:
 - A Honesty and Integrity
 - B Openness and Accountability
 - C Selflessness, Objectivity, Leadership
11. Each of the three sections begins with a statement of principle. This is followed by a number of provisions which set out the requirements of the Code in more detail.

The Code is not exhaustive and it should be remembered that all staff members of RSLs are responsible for ensuring that their conduct at all times meets the high standards that the RSL sector is recognised for upholding. As well as observing the detail of the Code, you should apply its intention and spirit to all situations in employment.

You are required to sign the Statement of Acceptance at the conclusion of this code which also outlines the implications for any breach of the code.

³ Committee for Standards in Public Life 1994, [Nolan Principles on Standards in Public Life](#)

The Code of Conduct

- A. Honesty and Integrity: You must act at all times with honesty and integrity. You must not use, or seek to use, your position to gain financial or other benefit for yourself, your family or friends.**

Gifts and hospitality

- A.1 You must act, and be seen to act, wholly in the interests of our organisation, our residents and other service users. You should not benefit improperly from your position.
- A.2 You must 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 you under an obligation to these individuals or organisations. You must comply with our policy on the matter.

Prevention of bribery

- A.3 We must comply with anti-bribery legislation. We must adopt, and comply with, anti-bribery and corruption policies.
- A.4 We forbid all forms of bribery - meaning a financial or other advantage or inducement intended to persuade someone to perform improperly any function or activity. You must not offer, seek or accept bribes and must comply with our policy on fraud. Offering, seeking or accepting bribes will result in disciplinary action and may also result in criminal prosecution.
- A.5 You must report to your manager or Head of HR any instances of suspected bribery within the organisation or any external organisation with which we have dealings.

Personal benefit

- A.6 You, or someone closely connected to you, cannot as a result of your role with us receive preferential treatment relating to any services provided by the organisation or its contractors/suppliers, and you should be able to demonstrate this
- A.7 You must not use, or seek to use, your position to promote your personal interests or those of any person with whom you are closely connected or the interests of any business or other organisation with which you have a connection.

Section 3 of Appendix 1 defines what is meant by 'closely connected'.

Resources, facilities and premises

- A.8 You must use our resources, facilities and premises only for the purposes intended and in a responsible and lawful manner, and in accordance with our IT policy. This includes office premises, telephone, computer and other IT facilities, equipment, stationery, transport and staff.

- A.9 You must comply with all of our relevant policies, including (but not exclusively) IT policy, health & safety, and equal opportunities.
- A.10 You must not undertake work for another organisation - or for any personal business - on KEY's premises nor use our resources or facilities for such a purpose, unless you have specific permission from your line manager.

Funds and expenses

- A.11 Our funds must be safeguarded from abuse, theft or waste. You must at all times apply and observe all of our financial regulations and internal controls.
- A.12 You must comply with our relevant policies when procuring goods/services or claiming expenses.

Tenants/service users and money

- A.13 As a general rule, in relation to tenants and service users you must not:
- Give or loan them money
 - Receive a gift or loan of money from them
 - Invite or influence them to make a will or trust under which you are named as executor, trustee or beneficiary.
- A.14 In circumstances where you have a declared family connection to a tenant/service user, common sense will be applied and the organisation would not seek to impose restrictions on the private exchange of money between you and that individual.

General responsibilities

- A.15 You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.
- You should be aware that under the Equality Act 2010, the following nine characteristics are specifically protected: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- A.16 In presenting information you must set out the facts and relevant issues truthfully.
- A.17 You must avoid any situation that could give rise to suspicion or suggest improper conduct.

- B. Openness and Accountability:** You must declare all relevant personal interests. You must handle information in accordance with our policies and procedures. You must report to the appropriate senior person within KEY any reasonable and honest suspicions you may have about possible wrongdoing.

Declaring interests

- B.1 We must ensure that no conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise. You must declare, and manage openly and appropriately, any actual or potential interests or conflicts.
- B.2 Where you have a personal, business or financial interest in any matter that is relevant to our activities or is being considered (or is likely to be considered), or you know that someone to whom you are closely connected has such an interest, you must declare it promptly to the Secretary at secretary@key.org.uk, who will record it in our Register of Interests.
- B.3 You must keep your entry in the Register of Interests complete, accurate and up to date.

Handling information

- B.4 You must observe and uphold the legal requirements and our policies in respect of the storage and handling of information, including personal and financial information. Our Data Protection Policy gives further guidance.
- B.5 You must respond to requests for information positively and must not prevent people or bodies from being provided with information that they are entitled to receive.
- B.6 You must not use confidential information acquired through your work as one of our employees for your private interests or any other purpose for which it is not intended.

Respecting confidentiality

- B.7 You must respect confidentiality and ensure that you do not disclose information to anyone who is not entitled to receive it, both whilst you are a member of staff and after you have left our employment.
- B.8 Unless specifically authorised to do so, you must 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 you are approached by the press or other media you must quickly pass the enquiry to the Head of HR].
- B.9 You must not publish any material or deliver any lecture or address any issues relating specifically to us or our activities without prior approval.

Using social media

B.10 We respect your right to a private life, and that includes joining any social media sites that you wish. However, as information posted on such sites is classed as public and not private, you must 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 C11 under “Upholding our reputation”). This applies whether you are posting under your own name or a pseudonym.

Reporting concerns

B.11 If you become aware of any actual or potential fraud, corruption or wrongdoing, or breaches of this Code, you must report this to your manager or to the Head of HR.. You may do so on a confidential basis. Our policy on whistleblowing gives further information.

B.12 You must not victimise any person who has used - or intends to use, or is suspected of having used - our confidential reporting or whistleblowing procedures to report any actual or alleged fraud, corruption or wrongdoing by others.

- C. Selflessness, Objectivity and Leadership: You must act in the best interests of KEY at all times within the framework set by the organisation, working to promote our aims and objectives, upholding our values and setting a good example by your own conduct.**

Fulfilling your role

- C.1 You must comply with your terms of appointment and our policies and procedures relating to your role.
- C.2 You must fulfil your 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.

As an organisation, we always aim to put the needs of our tenants and service users first, and we expect all of our staff to do the same in their day to day work, within the framework of our policies and procedures.

- C.3 You must work to 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 you are in doubt as to the legal and regulatory requirements that are relevant to your role, you must seek guidance from your manager.

- C.4 You must work at all times in accordance with our policies and procedures and not allow your own personal or political opinions to affect the way in which you carry out your duties. This does not impinge on your right to be an active citizen or, for example, to be an active trade unionist.
- C.5 You must take direction from your line manager, other senior managers and the governing body, and exercise responsibly any authority that comes with your role as a staff member.
- C.6 You must not seek to use informal channels to influence the governing body regarding decisions to be made about the conduct of our business.
- C.7 You must consult your manager before taking on any outside work or any position (paid or unpaid) that will in any way impact on your role with us. Any such work or position must not interfere with your existing job or conflict with our interests. Appendix 1 gives more details on declaring interests.
- C.8 You must participate in any necessary training, and play an active part in our staff development review process. You will contribute to the identification of any personal training needs you may have in order to keep your professional skills and knowledge up to date.

Working with tenants and other service users

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

Upholding our reputation

- C.12 You must not act in a way that could reasonably be regarded as bringing us into disrepute. This would include publicly making any derogatory comments about the organisation, its staff, governing body members, service users, partners and anyone that we are doing business with.

If you have a grievance or concern relating to a member of staff or of the governing body or have any concern about potential wrongdoing you should discuss it with your line manager or with the Head of HR.

- C.13 You must always be a positive ambassador for us and our work, especially when attending events as a member of our staff or in dealing with outside bodies.

Showing respect for others

- C.14 You must treat others with respect at all times. This includes considering the views of others and being tolerant of differences.
- C.15 You must adhere to both the letter and the spirit of our equality and diversity policy. See also A.15 above about the need to avoid discrimination of any kind.
- C.16 You must always conduct yourself in a courteous and professional manner. You must not, by your actions or behaviour, cause distress, alarm or offence.
- C.17 You must not harass, bully or attempt to intimidate any person.
- C.18 You must take care when displaying materials in the office, and ensure that these would not reasonably cause offence to your colleagues. If in doubt, consult your line manager before displaying any materials.

Breach of the Code

As a member of staff you have a responsibility to promote and uphold the requirements of this Code. 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 manager or Head of HR..

Any material breach of the Code will be considered under our disciplinary procedures and may result in a disciplinary action being taken, which may include dismissal.

As a member of staff you have a duty to co-operate with and contribute to any investigation relating to a potential breach of the Code or an associated matter

You must sign the below statement of acceptance once you have read and understood this Code and its requirements.

Statement of Acceptance

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 KEY.

I confirm that I am aware that I must declare and manage any personal interests in accordance with our policy.

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 KEY's disciplinary procedures and could ultimately result in my dismissal.

Signed _____

Date _____

This Code of Conduct was adopted by the Governing Body on 16 March 2016.
It will be reviewed annually.

Declaring and Managing Personal Interests

1. Introduction

- 1.1 Being a member of KEY staff is of course only one part of your life. Other aspects of your life - such as family, friends and neighbours, voluntary work, causes you support, possibly business or financial interests, possibly your own housing arrangements - may have the potential to cross over into your role as a staff member.
- 1.2 However, as we are an organisation that works for the community [and uses public funds], it is essential that there is no conflict - and that there can be no reasonable perception of conflict - between your duties as a member of staff and your personal (or personal business or financial) interests.
- 1.3 Any potential conflict between your position as a member of our staff and your other interests must be openly declared and effectively managed so as to protect the good reputation of KEY and the RSL sector.
- 1.4 As stated in the Code (provision B1), where you have a personal business or financial interest in any matter that is relevant to our activities or is being considered (or is likely to be considered) or you know that someone to whom you are closely connected has such an interest, you must declare it promptly to the Secretary, who will record it in the Register of Interests.
- 1.5 This Appendix gives further guidance on how to declare and manage any personal (including personal business or financial) interests.

2. Examples of interests that must be declared

- 2.1 The following are examples of the kind of interest that you must declare. Please note that this list is not exhaustive, and there may be other interests that you should also declare.
 - Tenancy of a property (by you or someone to whom you are closely connected) of which we are the landlord.
 - Receipt of care or support services from us.
 - Voluntary work with another RSL or with an organisation that does, or is likely to do, business with us.
 - Membership of the governing body of another RSL.
 - Being an elected member of any local authority where we are active.
 - If you purchase goods or services from us.
 - If you purchase goods or services from one of our approved contractors or Framework Agreement partners.

- Significant shareholding in a company that we do business with.
 - Unresolved dispute relating to the provision of services in connection with a tenancy or occupancy agreement or a contractual dispute over the provision of goods or services with us.
- 2.2 If you are not sure whether a certain matter needs to be declared, you must seek guidance from your manager or from the Head of HR. If doubt remains, the advice would always be to declare the matter.
- 2.3 You should note that in some circumstances, declaration of an interest may not be sufficient, and that it may be necessary for the organisation to take additional measures to deal satisfactorily with the situation so as to protect the probity and reputations of both yourself and the organisation.

3. Definition of 'close connection'

- 3.1 Someone 'closely connected' to you includes family members and persons who might reasonably be regarded as similar to family members even where there is no relationship by birth or in law.
- 3.2 The following table outlines those who you should consider when declaring interests:

Table A

Group 1 Members of your household	Group 2 People closely associated with you	Group 3 Others you need to consider
Anyone who normally lives as part of your household, whether they are related to you or not, including spouses/partners who work away from home and sons and daughters who are studying away from home	<ul style="list-style-type: none"> • Parents, parents-in-law and their partners • Sons and daughters; stepsons and step-daughters and their partners • Brothers and sisters and their partners • A partner's parent, child, brother or sister • Grandparents, grandchildren and their partners • Someone who is dependent on you or whom you are dependent on • Close friends 	<p>Other relatives (e.g. uncles, aunts, nephews & their partners)</p> <p>Other friends (e.g. someone you are acquainted with socially, neighbours, business contacts/associates)</p>

- 3.3 If you become aware of any action or involvement relating to **anyone** in the table then you should declare and manage this as soon as possible.
- 3.4 It is expected that you will be familiar with the actions of members of your household (Group 1) and of any other people listed in the table above with whom you are closely associated and/or in regular contact, and you must take steps to identify, declare and manage these.

However, it is understood that you will not always be closely acquainted with, or in regular contact with, all of the people listed, and you are not expected to be aware of the actions of people in groups 2 and 3 that you do not have a close association and/or regular contact with.

When considering your actions, you should do so from the point of view of a reasonable and objective observer, and a common sense approach should be adopted at all times.

4. Declaring personal interests

- 4.1 Interests should be declared by email to the Secretary at secretary@key.org.uk. On appointment, a member of staff would be required to complete a form to register any personal interests that could potentially conflict with their role, and to update with any material changes..
- 4.2 As stated in the Code (provision B2), you must keep your entry in the Register of Interests up to date, add any new interests as soon as they arise, and amend existing interests as soon as any change takes effect.
- 4.3 A situation may arise where you are invited to be present at a meeting where a matter in which you have a personal (or a personal business or financial) interest is discussed. In such cases you must inform the meeting chair at the start of the meeting, or as soon as you become aware that this is the case. You would then be required to leave the meeting for the duration of the particular item. If in any doubt, you should ask the meeting chair or another senior person present for guidance. This applies to all meetings that you attend as a member of our staff – both internal and external.
- 4.5 Any failure to make a complete, accurate and prompt declaration - whether deliberately or through taking insufficient care - will be regarded as a breach of this Code.