



CODE OF CONDUCT – STAFF

Introduction

CHISEL's Staff Code of Conduct is based on the principles of the National Housing Federation Code of Conduct (2012) to reflect our commitment to achieving high standards of probity and conduct from both our Board members and staff. The Code incorporates the seven principles of Public Life, these are:

Selflessness: To take decisions solely in terms of CHISEL values and purpose and not in order to gain financial or other material benefit for friends, family or yourself.

Integrity: Not to place ourselves under any financial or other obligation to outside individuals or organisations that might influence the performance of our duties.

Objectivity: To ensure impartiality in the delivery of services, the appointment of staff and the awarding of contracts, the choices being made on merit.

Accountability: To accept responsibility for our decisions and actions towards our residents, the providers of public funds and other stakeholders and to submit ourselves to whatever scrutiny is appropriate.

Openness: To be as open as possible about all the decisions and actions we take. We should give reasons for our decisions and restrict information only when individuals or commercial confidentiality demands.

Honesty: To declare any private interests relating to CHISEL. To act to protect CHISEL's reputation, values and purpose.

Leadership: To promote and support these principles by leadership and example.

General Responsibilities – What we expect from you

As a staff member you are expected to fulfil your duties responsibly, acting at all times in good faith and in CHISEL's best interests. This means that you are required to:

- Comply with the law, your contract of employment and CHISEL's policies and procedures.
- Conduct yourself in a reasonable manner and not bring CHISEL's reputation into disrepute. This includes membership or participation in activities or organisations whose values are not consistent with those of CHISEL's.
- Act in way that does favours or discriminate against particular groups or individuals or interests.
- Ensure you do not misuse your position – for example by using information acquired through your role for your private interests.
- Conduct yourself in a courteous manner at all times, and never use threatening or aggressive behaviour or undertake any duties on behalf of CHISEL whilst intoxicated.

Conflict of Interest

Staff are required to complete an annual declaration of interest form. All staff are required to avoid conflicts of interest and ensure that undeclared conflicts do not arise or could be reasonably seen to arise between your duties on behalf of CHISEL and your personal interests. Staff should take particular care to avoid any suggestion of impropriety in relationships with individuals or companies. Staff have a responsibility to ensure:

- The declaration of interests is accurate and up to date
- You are not involved in the appointment of staff or contractors where you are related or closely connected to an organisation or an individual applying or tendering for a contract.
- If you are a Board or committee member of another social landlord or voluntary agency or an elected member of a local authority, then you should declare this so we can consider any potential conflict of interest.

Examples of possible conflicts of interests are:

- Employment, ownership or significant shareholding in a company or partnership providing products or services to the housing association sector
- Tenancy or leasehold interest of a property owned by the CHISEL
- Membership of a campaigning, residents' or community organisation which has interest in the business and/or operation of CHISEL

If you are not sure whether something constitutes a "conflict of interest" you should discuss this with your manager or the MD or declare it so that you protect yourself from any potential or perceived conflict of interest.

Staff must immediately notify CHISEL if they become the subject of any criminal or civil proceedings, which could compromise their position.

Outside of Work Activities

We understand that activities outside work are your own business, but in some circumstances they could overlap or conflict with the interests of CHISEL. As a general guide, you should not do anything outside of work that would damage CHISEL's reputation. If you are in any doubt, you should declare the matter to your manager, complete a **declaration of interests form** if appropriate, and seek any necessary written permission.

Many of CHISEL's staff work part-time – where employment outside CHISEL could be deemed to be a conflict of interest, a declaration of interest should be made. Duties associated with this employment or any voluntary work should not be undertaken within CHISEL's paid office hours and no use of office facilities such as postage or phones or IT facilities should be used in relation to this work.

In the interests of transparency, membership of political parties and pressure groups should always be declared.

All disclosures of interest are held in a register by the MD /Company Secretary. This register is open to public scrutiny and will be reviewed by the Board annually.

You are still required to follow this code of conduct and CHISEL's other policies relating to conduct (e.g. Disciplinary Policy / Bullying & Harassment Policy) during any activities which are outside of CHISEL's premises but are still linked to work in some way (e.g. work social events, work drinks or leaving parties). We always expect you to treat others with respect and dignity, and you should always expect to be treated appropriately by your colleagues.

The reasons for this are partly to protect CHISEL's reputation, but also to ensure that behaviour during work related events does not harm the relationships between staff members and that we treat each other appropriately at all times.

Relationships

You should try and avoid any personal relationships that may lead to a conflict of interest or an appearance of a conflict. If you have a personal relationship / friendship or are related in any way to anyone from within the following groups you must immediately declare this to CHISEL using the declaration of interests form:

- CHISEL Board Members
- Current or potential CHISEL tenants
- Current or potential CHISEL contractors / suppliers
- Other CHISEL staff / job applicants.

We can then consider the impact of this and whether it has the potential to be a conflict of interest and advise you further. In extreme cases, e.g., an inappropriate relationship with someone in a group listed above, this may lead to your dismissal, especially if the relationship is not immediately declared.

You must not ask or influence a tenant to make a will or trust naming you or one of your family members or friends as an executor, trustee or beneficiary. You may not receive loans, or give loans from your personal money to tenants.

If you are involved in awarding tenancies or allocating housing you must always ensure absolute impartiality in the decisions made by following CHISEL's procedures and avoiding any conflict of interest.

If you are involved in recruitment then you should make sure that decisions are based only on the ability of the candidate to undertake the duties of the post.

In order to avoid any possible accusation of bias, you must follow the appropriate procedures, and should not be involved in any recruitment where you are related to an applicant, or have a close personal relationship outside work with the individual or a member of their family.

Tendering and purchasing

You are expected to keep CHISEL's funds and resources safe from abuse, theft, or waste. You should always try to get value for money for CHISEL, its residents and any public or charitable funds.

You must exercise fairness and impartiality when dealing with all consultants, suppliers, contractors and sub-contractors. Even the appearance of impropriety can be highly damaging, so it is vital that all purchasing decisions are made on an objective basis, and seen to be so. All orders and contracts must be awarded on merit, by fair competition. You must comply with CHISEL's Financial Standing Orders and procedures to ensure fair tendering or procurement processes.

No special favour should be shown to any business which you or any members of your family or friends have some personal or professional connection to. The same applies to any business connected with current or recent former employees or their partners, close relatives or associates. You may not award a contract to such a business and should inform your manager or the MD immediately you become aware that a potential conflict of interest exists.

If you have access to personal or confidential information on tender costs or other commercially sensitive information, then you must not disclose that information to any unauthorised person or organisation.

Use of CHISEL's suppliers or contractors

You should avoid private use of suppliers, contractors, consultants or other organisations used by CHISEL.

If you use CHISEL's suppliers, contractors, consultants or other organisations for personal services, you must be clear about the separation between your personal purchasing decision and your role in CHISEL. You must not accept special treatment (such as discounted prices, extra benefits or other advantages) for your personal use that would not also be available to a customer of that company who was not a CHISEL employee. **You must obtain written consent from your line manager / MD before such use and declare it on the declaration of interests form.**

Bribery, gifts and hospitality

You should ensure you comply with the Bribery Act 2010, and should neither accept bribes nor attempt to bribe anyone else.

Therefore, you must never, under any circumstances, accept personal gifts of cash, or gifts with a significant monetary value, as these may be perceived to be a bribe, even if the intention was different.

You should always formally notify the Managing Director if you feel any cash, gifts or hospitality have been offered with the clear intention of trying to influence you or any other employee of CHISEL.

Similarly, staff must not seek or accept gifts, hospitality or other benefits from either individuals or organisations that might reasonably be seen to compromise your judgement or integrity. Staff must:

- Provide prior approval and receipts for hospitality undertaken on behalf of CHISEL
- Either decline gifts or hospitality or seek approval to accept modest gifts(under the value of £10) which should be recorded in CHISEL's gift and hospitality register

When declining a gift you should be courteous but firm and draw the attention of the person making the gift to the existence of these rules. In some instances offence may be caused to tenants by a refusal. In such circumstances, if the gift is modest, e.g. a box of chocolates, the gift may be accepted (and must always be declared regardless of the value) on behalf of CHISEL.

Funds and Resources

Staff must not misuse Chisel's funds or resources, including for example telephones, computers and other IT facilities, equipment, vehicles, stationary and stamps. Staff must:

- Not use CHISEL's email to send personal emails or use the IT system to produce or store data for personal use.
- Only claim reimbursement for expenditure that was properly and reasonably incurred in carrying out duties on behalf of CHISEL. Any expenses claimed must comply with CHISEL's policies and procedures.

Confidentiality

Staff must act at all times in accordance with the law, Chisel's policies and procedures and the provisions of the Data Protection Act 1998. All personal data about tenants and service users employees and others whether on paper or electronically is subject to the provision of the Act. Staff must:

- Not disclose any confidential business information without authority. This duty continues after you have left CHISEL or relinquished your position.
- You must not distribute to the press or media or any other external recipient information or materials relating to CHISEL
- You must not write letters, articles, blogs or tweets about CHISEL and its activities, without prior authorisation.
- You must not make comments or statements to the media about CHISEL without prior authorisation.

Respect for others

Staff must maintain constructive professional relationships whilst carrying duties on behalf of CHISEL, demonstrating loyalty to CHISEL, its values and objectives.

Staff must:

- Respond constructively to questioning or challenges
- Respond willingly to requests for information.
- Not use informal channels to lobby or influence Board members
- Not knowingly mislead the Board or any of CHISEL's committees or panels.
- Must never allow themselves to be compromised by, nor taken advantage of, their relationships with residents. The relationship of trust must never be abused.
- Must not invite, influence or allow a tenant to make a will or trust under which any member of staff is named as executor, trustee or beneficiary.

Health and Safety and Security

Staff must not endanger the health, safety or security of yourself or others.

- You must comply with CHISEL's health and safety policies and procedures.
- You must comply with current legislation regarding smoking at work on both the office premises and in the CHISEL's work van.
- Where you are provided with protective clothing this must be worn
- You must comply with CHISEL's guidance in relation to the security of the office premises.

Failure to Follow This Code

Staff should recognise that failure to follow the Code of Conduct may damage CHISEL and will normally be viewed as a disciplinary matter and will be dealt with under CHISEL's disciplinary procedures. Anyone found to have committed serious breaches such as bribery or corruption is likely to face dismissal and may also be subject to police investigation, civil and/or criminal charges.

If you become aware of any breaches of this code or any other impropriety, you should report this to your line manager or the MD. You may choose to do this under CHISEL's confidential Whistleblowing policy.