



"Offering our community more than a home"

Code of Conduct for Staff

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CHA Objectives:

- To manage the houses provided, in a professional and cost-effective manner, for the benefit of our local community and the environment.
- To provide a first-class maintenance service which offers value for money and ensures the comfort and safety of our residents while achieving high levels of satisfaction
- To ensure that our resources are adequate to deliver our objectives by investing in our people, demonstrating value for money and through robust procurement practices.
- To promote social inclusion by applying principles of equality and diversity to everything we do.

Regulatory Standards:

- The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.
- The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these objectives.
- The RSL manages its resources to ensure its financial well-being, while maintaining rents at a level that tenants can afford to pay
- The governing body bases its decision on good quality information and advice and identifies and mitigates risks to the organisation's purpose.
- The governing body and senior officers have the skills and knowledge they need to be effective
- The RSL conducts its affairs with honesty and integrity.

Any material breach or non-compliance with legislation/regulatory requirements in relation to this Policy constitutes a Notifiable Event and the Regulator will be informed via the SHR Portal.

If you have difficulty with reading this policy, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.



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Introduction

This Code of Conduct is based on the SFHA and EVH Model Code of Conduct for Staff which was updated in October 2024.

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

The Code reflects our Values which you are required to uphold. They are:

- ***Respectful***- *we will treat all our customers with courtesy and respect*
 - ***Accountable*** – *we will be open, honest and approachable and act with the highest integrity at all times*
 - ***Responsive and Informative*** – *we will listen, respond and inform through effective and timely communication*
 - ***Professional*** – *we will ensure we have the appropriate skills and strive for excellence in all aspects of our service*
1. Clydebank Housing Association (CHA) 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. You are required to observe these standards in all the activities that you undertake in connection with your employment with us.
 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 with input from Employers in Voluntary Housing (EVH) – which the Scottish Housing Regulator (SHR) has confirmed that this Code fully complies with its Regulatory Standards.
 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**' on page 12) 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.

¹ Scottish Housing Regulator (2024) Regulatory Framework, [Regulatory Standard 5.2](#)

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 will also be able to give guidance where you are unsure how the Code or related policies apply in a particular situation.
7. This Code of Conduct was adopted by the Management Committee on 26th November 2024.

Who the Code applies to

8. This Code of Conduct applies to everyone who works for us whether employed directly or otherwise.
- 9.. A copy of this Code will be given to every person that it applies to.

How the Code is structured

10. The Code is based on the Nolan Principles on Standards in Public Life² which are recognised as defining good conduct for those who work for the public using public money.
11. 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
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 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 on page 12 which also outlines the implications for any breach of the code.

² Committee for Standards in Public Life (May 1995), [Nolan Principles](#)

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

Prevention of bribery

- A.3 We must comply with anti-bribery legislation. I will comply with our 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. I will not offer, seek or accept bribes or other inducements from any individual or organisation and I will comply fully with our policy on bribery [insert name of policy]. I am aware that offering, seeking or accepting bribes or other inducements will result in disciplinary action and may also result in criminal prosecution.
- A.5 I will report to the Chief Executive or my Manager any instances of suspected bribery within the organisation or any external organisation with which we have dealings.

Personal benefit

- A.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 organisation or its contractors/suppliers and I will ensure that I can demonstrate this.
- A.7 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.

Resources, facilities and premises

- A.8 I will only use our resources, facilities and premises only 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.
- A.9 I will comply with all of our relevant policies, including (but not exclusively) IT Policy (usage of internet & email social media), health & safety, equalities, inclusion, human rights and diversity and dignity at work.
- A.10 I will not undertake work for another organisation - or for any personal business - on Clydebank Housing Association's premises nor use our resources or facilities for such a purpose unless I first have specific permission from my line manager.

Funds and expenses

- A.11 I recognise that Clydebank Housing Association's 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.
- A.12 I will comply with our relevant policies when procuring goods/services and/or claiming expenses.

Tenants/service users and money

- A.13 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
 - Invite or influence them to make a will or trust under which you are named as executor, trustee or beneficiary.

General responsibilities

- A.14 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.
- A.15 In presenting information I will take all reasonable steps to ensure that I set out the facts and relevant issues truthfully.

- A.16 I will avoid any situation that could give rise to suspicion or suggest improper conduct.
- A.17 I will inform my manager or the Chief Executive if I am notified of any action by a professional body that is relevant to my role with CHA and/or which could impact CHA's reputation that I am or may be party to.

- 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 (the Chief Executive) within Clydebank Housing Association any reasonable and honest suspicions you may have about possible wrongdoing.

Declaring interests

- B.1 I recognise that CHA 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.
- B.2 Where I have a personal, business or financial interest in any matter that is relevant to CHA's 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 our Register of Interests.
- B.3 I will keep my entry in the Register of Interests complete, accurate and up to date.

Handling information

- B.4 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. CHA's Data Protection Policy gives further guidance.
- B.5 I will respond to requests for information positively and will not prevent people or bodies from being provided with information that they are entitled to receive.
- B.6 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

- B.7 I will respect confidentiality and ensure that I do 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 Clydebank Housing Association.
- B.8 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 you are approached by the press or other media you must quickly pass the enquiry to the Chief Executive or a member of the Senior Staff team.

B.9 I will not publish any material or deliver any lecture or address any issues relating specifically to us or our activities without prior approval. This includes invitations to speak at conferences or external events.

Using social media

B.10 I will not disclose any private or confidential information relating to us, our customers, partners, suppliers, committee/governing body members, or employees on any social networking sites, bulletin boards, blogs or similar. (see also **C12** under “**Upholding our reputation**”). This applies whether I am posting under my own name or a pseudonym.

Reporting concerns

B.11 If I become aware of any actual or potential fraud, corruption or wrongdoing, or breaches of this Code, I will report this to my manager or to the Chief Executive. I am aware that I may do so on a confidential basis. Our policy on whistleblowing gives further information.

B.12 I will not victimise any person who has used – or intends to use/ 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 Clydebank Housing Association 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 I will comply with the terms of my appointment and our policies and procedures relating to my role.

C.2 I will fulfil my duties responsibly, exercising reasonable skill and care and acting at all times in CHA's best interests and that of our tenants and other service users.

I will always aim to put the needs of CHA's tenants and service users first in my day-to-day work, within the framework of our policies and procedures.

C.3 I will uphold and promote CHA's 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 manager.

C.4 I will work at all times in accordance with our policies and procedures and not allow my own personal or political opinions to affect the way in which I carry out my duties. This does not impinge on my right to be an active citizen or to be an active trade unionist.

C.5 I will take direction from my line manager, other senior managers and the governing body, and exercise responsibly any authority that comes with my role as a staff member.

C.6 I will not seek to use informal channels to influence the governing body regarding decisions to be made about the conduct of our business.

C.7 I will consult my manager before taking on any outside work or any position (paid or unpaid) that will in any way impact my role with CHA. I recognise that any such work or position must not interfere with my existing job or conflict with CHA's interests.

- C.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

- C.9 I will maintain high standards of professionalism, fairness and courtesy in all my dealings with tenants and other service users.
- C.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.
- C.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

- C.12 I will not act in a way that could reasonably be regarded as bringing CHA 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.

I will discuss any grievance or concern that I have about a member of staff or the governing body with my line manager or with the Chief Executive.

- C.13 I will always be a positive ambassador for CHA 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 I will always treat others with courtesy and respect. I will consider and respect the views of others.
- C.15 I will adhere to both the letter and the spirit of our Equality and Diversity policy and our Dignity at Work Policy. See also **A.14** about the need to avoid discrimination of any kind.
- C.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.
- C.17 I will not harass, bully or attempt to intimidate any person.
- C.18 I will take care when displaying materials in the office, and ensure that these would not reasonably cause offence to your colleagues.
- C.19 When attending meetings, I will be courteous to all attendees and respect the position of the meeting chair or convenor.

Breach of the Code

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 manager or the Chief Executive.

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.

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 and Signature

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 Clydebank Housing Association.

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

Signed _____

Date _____

Review

This Code will be reviewed every 3 years or sooner should there be any changes required due to updates on best practice.

For Office Use Only – Required Actions

Customer Consultation Required/Arranged	No
Intranet Update	Yes
F Drive Update	Yes
Website Update	Yes
Leaflet change required?	No
Newsletter Promotion?	No
Other information updated, e.g. posters, automatic email responses, post cards, answering machine messages, etc.	No
Equality Impact Assessment completed	Yes

Clydebank Housing Association Equality Impact Assessment Tool

The Equality Impact Assessment process aims to prevent discrimination against people who are categorised as being disadvantaged or vulnerable within society (as listed in point 4).

Name of the policy / proposal to be assessed	Code of Conduct for Staff	Is this a new policy / proposal or a revision?	Revision
Person(s) responsible for the assessment	Lynette Lees		
1. Briefly describe the aims, objectives and purpose of the policy / proposal	<ul style="list-style-type: none"> • The Code of Conduct sets out the standards of conduct required of members of our staff. • A copy of the Code will be given to every person that it applies to. 		
2. Who is intended to benefit from the policy / proposal? <i>(e.g. applicants, tenants, staff, contractors)</i>	<ul style="list-style-type: none"> • The Code of Conduct applies to everyone who works for us whether employed directly or otherwise. 		
3. What outcomes are wanted from this policy / proposal? <i>(e.g. the benefits to customers)</i>	<p>The Code of Conduct will ensure that all staff and everyone else that the code applies to are aware of the standards that are expected of them and why. It also details “close connections” and when it is appropriate to declare interests.</p> <p><i>Adopting and adhering to the Code will ensure that all stakeholders have confidence in the organisation, will ensure that standards are met and what will happen if there is a breach. The Code demonstrates our accountability to our customers and everyone associated with CHA.</i></p>		

4. Which **protected characteristics** could be **affected** by the proposal? (*tick all that apply*)

- Minority Ethnic
 Gender
 Disability
 Sexual Orientation
 Age
 Religion
 Transgender /Transsexual
 Marriage /Civil Partnership
 Pregnancy /Maternity

5. If the policy / proposal is not relevant to any of the **protected characteristics** listed in part 4, state why and end the process here.
 Applicable to all – no particular group will be adversely affected by this Policy

	Positive impact(s)	Negative impact(s)
<p>6. Describe the likely positive or negative impact(s) the policy / proposal could have on the groups identified in part 4</p>	<p>All groups will have clear information on our standards and expectations concerning The Code of Conduct.</p>	<p>N/A</p>
<p>7. What actions are required to address the impacts arising from this assessment? (<i>This might include; collecting additional data, putting monitoring in place, specific actions to mitigate negative impacts</i>).</p>	<p>Annual declarations to be signed by all staff to indicate that they understand and will comply with the Code of Conduct</p>	

Signed: _____ L Lees _____ (Job title): _____ Chief Executive _____

Date the Equality Impact Assessment was completed: _____ 21.11.2024 _____

Please attach the completed document as an appendix to your policy / proposal report