

**CODE OF CONDUCT FOR EMPLOYEES**

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| Date Revision Complete | June 2018  |
| Policy Owner           | Head of HR & OD  |
| Author                 | Head of HR & OD  |
| Reason for Revision    | Checked and Updated in line with changes to SFHA Model Code of Conduct August 2017 |
| Data Protection        | References to data protection are contained within the Code of Conduct             |
| Proof Read             | Yes  |
| Date Approved          | 18 <sup>th</sup> June 2018   |
| Approved by            | EMT  |
| Next Review Due        | June 2021  |

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|----------------|----------------------------------|
| Audience       | All employees and relief workers |
| Effective Date | 18 <sup>th</sup> June 2018       |

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| Internal References | Entitlements, Payments, Benefits Policy and Procedure, Email and Internet Usage Policy, Whistleblowing Policy, Procurement Policy and Procedure, Equal Opportunities Policy; Fraud Policy; Disciplinary Policy and Procedure; Bullying and Harassment Procedure; Health and Safety Management System; Data Protection Policy |
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| External References | The Scottish Housing Regulator (SHR) – Standards of Governance and Financial Management, Scottish Federation of Housing Associations (SFHA) & Employers in Voluntary Housing (EVH) Code of Conduct<br>Scottish Social Services Council (SSSC) Code of Practice |
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Comments

As a Registered Social Landlord (RSL), we are required 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 Employers in Voluntary Housing (EVH) and also incorporates the SSSC Code of Practice.

## **Code of Conduct for Employees**

### **1. Introduction**

- 1.1 Blackwood attaches 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 team.
- 1.3 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.
- 1.4 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 or HR. Your manager, or the HR Team, will also be able to give guidance where you are unsure how the Code or related policies apply in a particular situation.
- 1.5 This Code of Conduct applies to everyone who works at Blackwood whether you are employed on a permanent, fixed term or temporary basis, or are engaged as a relief worker.
- 1.6 A copy of this Code of Conduct will be given to every person who joins Blackwood.
- 1.7 The Code is not exhaustive. Everyone is responsible for ensuring that their conduct at all times meets the high standards that our 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.
- 1.8 The Code of Conduct has clear links to our values: Be Open and Honest, Have Respect and Understanding, Keep our Promises, and Take Responsibility. All employees are expected to uphold these values at all times.
- 1.9 The Code of Conduct is split into three main sections. References to other Blackwood Policies and Procedures are included at the end of each section where appropriate.

## **The Code of Conduct**

**2.1 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.**

### **2.2 Gifts and hospitality**

2.2.1 You must act, and be seen to act, wholly in the interests of Blackwood, and our customers. You should not benefit improperly from your position.

2.2.2 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.

### **2.3 Prevention of bribery**

2.3.1 Blackwood must adopt and comply with anti-bribery legislation. Please see our Fraud Policy for more information.

2.3.2 Blackwood forbids all forms of bribery - meaning a financial or other advantage or inducement intended to persuade someone to perform improperly any function or activity.

2.3.3 You must not offer, seek or accept bribes. Offering, seeking or accepting bribes will result in disciplinary action and may also result in criminal prosecution.

2.3.4 You must report to your manager or the Chief Executive any instances of suspected bribery within the organisation.

### **2.4 Personal benefit**

2.4.1 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.

2.4.2. 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.

## **2.5 Resources, facilities and premises**

- 2.5.1 You must 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 employees.
- 2.5.2 Reasonable personal use of email and internet access is permitted but must be kept outside normal working hours. Our Internet & Email Policy gives further information including what is meant by 'reasonable personal use'.
- 2.5.3 You must not undertake work for another organisation - or for any personal business - on Blackwood's premises nor use our resources or facilities for such a purpose, unless you have specific permission from your manager.

## **2.6 Funds and expenses**

- 2.6.1 Our funds must be safeguarded from abuse, theft or waste. You must at all times apply and observe all of our financial policies and procedures and internal controls.
- 2.6.2 You must comply with our Procurement Policy and Procedure when procuring goods/services or claiming expenses.

## **2.7 Customers and money**

- 2.7.1 In relation to customers 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.
- 2.7.2 In circumstances where you have a declared family connection to a customer, 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.

## **2.8 General responsibilities**

- 2.8.1 You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.
- 2.8.2 You should be aware that under the Equality Act 2010, the following nine characteristics are specifically protected against discrimination: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

- 2.8.3 In presenting information you must set out the facts and relevant issues truthfully.
- 2.8.4 You must avoid any situation that could give rise to suspicion or suggest improper conduct.

## **2.9 Link to Blackwood Policies and Procedures**

- 2.9.1 This section should be read in conjunction with the following policies Blackwood's Entitlements, Payments and Benefits Policy; Email and Internet Usage Policy; Health and Safety Management System; Procurement Policy and Procedures; Fraud Policy; and Equal Opportunities and Diversity.

## **3.0 You must declare all relevant personal interests. You must handle information in accordance with our policies and procedures. You must report to your manager or HR Team any reasonable and honest suspicions you may have about possible wrongdoing.**

### **3.1 Declaring interests**

- 3.1.1 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.
- 3.1.2 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 and record it according to our Entitlements, Payments and Benefits Policy.
- 3.1.3 You must keep Blackwood up to date with any Declaration of Interests that may arise, in line with our Entitlements, Payments & Benefits Policy.

### **3.2 Handling information**

- 3.2.1 You must observe and uphold the legal requirements and our Data Protection Policy in respect of the storage and handling of information, including personal and financial information.
- 3.2.2 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.
- 3.2.3 You must not use confidential information acquired through your work for your private interests or any other purpose for which it is not intended.

### **3.3 Respecting confidentiality**

- 3.3.1 You must respect the confidentiality of both customers, and the organisation, and ensure that you do not disclose information to anyone who is not entitled to receive it, both whilst you are an employee (or a relief worker) and after you have left our employment.
- 3.3.2 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 Marketing Manager.
- 3.3.3 You must not publish any material or deliver any lecture or address any issues relating specifically to us or our activities without prior approval.

### **3.4 Using social media**

- 3.4.1 Blackwood encourages its employees to use social media to communicate with customers, colleagues and stakeholders on a professional basis. We also respect your right to a private life, which includes joining any social media sites that you wish. However, as information posted on such sites is classed as public and not private, you are expected to uphold the reputation of Blackwood at all times. More information about your responsibilities can be found in the Email and Internet Usage Policy.

### **3.5 Reporting concerns**

- 3.5.1 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 Human Resources Team. You may do so on a confidential basis. Our policy on Whistleblowing gives further information.
- 3.5.2 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.

### **3.6 Link to Blackwood Policies and Procedures**

- 3.6.1 This section should be read in conjunction with the following policies: Entitlements, Payments and Benefits Policy; Email and Internet Usage Policy; Data Protection Policy; Equal Opportunities and Diversity Policy; Fraud Policy and the Whistleblowing Policy.

**4.0 You must act in the best interests of Blackwood 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.**

**4.1 Fulfilling your role**

- 4.1.1 You must comply with your terms and conditions of employment and all policies and procedures relating to your role.
- 4.1.2 You must fulfil your duties responsibly, exercising reasonable skill and care and acting at all times in Blackwood's best interests and that of our customers. You must work in a safe and effective way according to our Health and Safety Management System.
- 4.1.3 As an organisation, we always aim to put the needs of our customers first, and we expect all of our employees to do the same in their day to day work, within the framework of our policies and procedures.
- 4.1.4 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 (SHR), the Office of the Scottish Charity Regulator (OSCR), the Scottish Social Services Council (the SSSC), the Financial Conduct Authority (FCA) and the Care Inspectorate).
- 4.1.5 If you are in doubt as to the legal and regulatory requirements that are relevant to your role, you must immediately seek guidance from your manager.
- 4.1.6 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, for example, a member of a Trade Union.
- 4.1.7 You must take direction from your manager, and other senior managers, and exercise responsibly any authority that comes with your role as an employee.
- 4.1.8 You must keep clear and accurate records when you are required to do so.
- 4.1.9 You must not seek to use informal channels to influence the governing body regarding decisions to be made about the conduct of our business.
- 4.1.10 You must inform your manager or Human Resources Team about any personal difficulties that might affect your ability to do your job competently and safely. If you don't believe you are adequately trained nor have the necessary competencies to do your role you must contact your manager without delay.
- 4.1.11 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. You will be required to complete a Declaration of Interest: Request for Approval form for any second job which impacts on your role with us in line with our Entitlements Payments & Benefits Policy.

- 4.1.12 You must recognise and respect the roles and expertise of people from other agencies, as appropriate, and work in partnership with them.
- 4.1.13 You will undertake the relevant training to maintain and improve your knowledge and skills and contribute to the learning and development of others.

## **4.2. Working with customers**

- 4.2.1 You must maintain high standards of professionalism, fairness and courtesy in all your dealings with our customers. You must strive to gain the trust of all our customers.
- 4.2.2 You must be reliable and dependable and provide excellent customer service at all times. You must be committed to honouring work commitments, agreements and arrangements and where it is not possible to do so, you must explain any reason behind the delay to the customer.
- 4.2.3 You must not form inappropriate personal relationships with customers nor allow any personal relationship with a customer to conflict with the conduct of your role and responsibilities.
- 4.2.4 You must use the appropriate channels, for example Blackwood's Compliments, Suggestions and Complaints database, for handling all customer issues. You must not act outside our established procedures in any matter concerning any customer.

## **4.3 Upholding our reputation**

- 4.3.1 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 employees, Board members, customers, partners and anyone that we are doing business with. You must also uphold the reputations of the sectors in which we operate.
- 4.3.2 If you have a grievance or concern relating to an employee, or of the governing body, or have any concern about potential wrongdoing you should discuss it with your manager or with the HR Team.
- 4.3.3 You must always be a positive ambassador for Blackwood and our work, especially when attending events as an employee or in dealing with outside bodies.
- 4.3.4 You must not behave in a way, in work or outside work, which would call into question your suitability to work in our sector.

#### **4.4 Showing respect for others**

- 4.4.1 You must treat others with respect at all times and always remain professional. This includes considering the views of others and being tolerant of differences.
- 4.4.2 You must promote the independence of customers, assisting them to understand and exercise their rights.
- 4.4.3 You must not harass, bully or attempt to intimidate any person. If you witness, or are subject to, any threatening or discriminatory behaviour you must contact your manager or Human Resources Team without delay.
- 4.4.4 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 manager before displaying any materials.
- 4.4.5 When attending meetings, you must be courteous to all attendees and respect the position of the meeting chair or convenor. You must also ensure that mobile phones are switched off/on silent other than in very exceptional circumstances where it is necessary to take an urgent call.
- 4.4.6 You must report any operational difficulties that prevent you from providing a safe working environment or delivering a safe level of care.

#### **4.5 Link to Blackwood Policies and Procedures**

- 4.5.1 This section should be read in conjunction with the following policies: Health and Safety Management System; Bullying and Harassment Procedure.

#### **5. Breach of the Code**

- 5.1 As an employee 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 employee, you should immediately bring the matter to the attention of your manager or a member of the HR Team.
- 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 may include dismissal.
- 5.3 As an employee 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.

## **5.5 Link to Blackwood Policies and Procedure**

5.5.1 This section should be read in conjunction with the following policies:  
Disciplinary Policy and Procedure.

### Statement of Acceptance

|                        |  |
|------------------------|--|
| <b>Name</b>            |  |
| <b>Team / Location</b> |  |

I have read and understood the terms of this Code of Conduct and I agree to uphold its requirements in all my activities as an [employee/relief worker] of Blackwood.

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

|               |  |
|---------------|--|
| <b>Signed</b> |  |
| <b>Dated</b>  |  |