



TRINITY

HOUSING ASSOCIATION

Policy	Code of conduct
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THA CODE OF CONDUCT

INTRODUCTION

Trinity Housing Association Limited (THA or Society) Code of Conduct defines the conduct required of anyone directly involved in delivering THA's business activities. Unless indicated, the code applies equally to Shareholder/Board members, staff, volunteers and involved residents.

You must ensure that your actions and behaviour are consistent with THA's values and the high standards of conduct required to maintain confidence in THA and its work.

You must familiarise yourself with the contents of the code and act in accordance with its principles and provisions at all times. Failure to comply with the code may be an employment or governance disciplinary matter.

If Shareholder/Board members or involved residents have any doubts or questions regarding the application of the code, or in relation to a specific issue, they should seek advice and guidance from the Company Secretary. Members of staff should seek advice and guidance from their line manager or the Company Secretary if they prefer.

This Code of Conduct is based on the NHF Code of Conduct 2020 and the principles of public life which are - selflessness, integrity, objectivity, accountability, openness, honesty and leadership

Communication and Training

THA is committed to ensuring that this Code of Conduct is easily understood by all stakeholders. Regular communication efforts will be undertaken to disseminate the content of this Code, and training programs will be conducted where appropriate, to provide insights into the principles outlined herein. The language used will be clear, concise, and inclusive, ensuring accessibility for all individuals involved in THA's activities.

The main principles of the code

A General responsibility: You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of THA, its residents and other service users.

B Conflicts of interests: You must take all reasonable steps to ensure that no undeclared conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise.

C Bribery, gifts and hospitality: You must not offer, seek or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisations.

D Funds and resources: You must not misuse THA's funds or resources.

E Confidentiality: You must handle data and information in accordance with the law, regulations and THA's policies and procedures.

F Respect for others: You must treat others with respect at all times.

G Relationship between board and committee members, staff, volunteers and involved residents: Board and committee members, staff, volunteers and involved residents must maintain a constructive, professional relationship based on a sound understanding of their respective roles.

H Relationship with residents and other service users: You must maintain high standards of professionalism, fairness and courtesy in all your dealings with residents and other service users.

I Health, safety and security: Your conduct must not endanger the health, safety or security of yourself or others.

J Conduct at meetings: Your conduct at board and other meetings must meet a high standard of integrity, commitment and courtesy.

K Representing the Society: In representing THA at external events and in dealings with outside bodies, you must uphold and promote THA's values, objectives and policies.

L Learning and development: In partnership with THA, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

M Reporting concerns: You must report any reasonable and honest suspicions you may have about possible wrongdoing.

A: GENERAL RESPONSIBILITIES

Main principle

You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of THA, its residents and other service users.

Provisions

A1 You must comply with the law, your terms of appointment and THA's policies and procedures relating to your role.

A2 You must not conduct yourself in a manner which could reasonably be regarded as bringing THA into disrepute. This includes membership of, or participation in, activities

organised by groups or organisations whose values are inconsistent with THA's (for instance, racist organisations) which could create reasonable doubt in your ability to comply with THA's values and this code.

A3 You must not bring THA's name into disrepute or affect its integrity by your actions or words, either within the organisation or outside. This includes the use of, or entries on, social networking sites (such as Facebook, Twitter, YouTube and others). This includes making derogatory comments about THA, its residents or other service users, partners or services, either in person or in writing or via any web-based media such as a personal blog or other site. This also applies if you do not name THA but where its identity can reasonably be inferred, or where you use a pseudonym but your identity can reasonably be inferred. If you have a genuine concern about possible wrongdoing, you must report it to the appropriate senior person within the organisation (see section M below).

A4 You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.

A5 You must respect the appropriate channels for handling tenancy and service provision issues. You must not act outside THA's established procedures in any matter concerning any resident or other service user.

A6 You must not misuse your position, for example, by using information acquired in the course of your duties for your private interests or those of others.

A7 You must respect the principle of collective decision-making and corporate responsibility. This means that once the Board has made a decision you must support that decision.

A8 You must not engage in any political or campaigning activity that might compromise the position of THA. Board and committee members or involved residents intending to stand for political office must discuss the matter with the chair; members of staff with their line manager.

Board and committee members

A9 If you take up new employment or appointments during your term of office on any of THA's boards or committees, you must make any necessary declaration of interest. Any such work or position must not interfere with your role as a board or committee member.

Staff members

A10 You must consult your manager before taking on any outside work or any position, paid or unpaid. Any such work or position must not interfere with your existing job or conflict with the interests of your job or THA.

B: CONFLICTS OF INTERESTS

Main principle

You must take all reasonable steps to ensure that no undeclared conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise.

THA recognises that conflicts of interest may arise in the course of its operations. To effectively manage such conflicts, individuals must promptly disclose any potential conflicts of interest to the appropriate authority within THA. The organisation will establish transparent processes for handling such disclosures, ensuring that decisions are made impartially and in the best interests of THA. Details of the conflict management procedures will be provided in THA's Conflict of Interest Policy.

Provisions

B1 You must comply with THA's policies and procedures for declaring, recording and handling conflicts of interest. Amongst other things, these require you to declare any private interests which may, or may be perceived to, conflict with the duties of your role.

B2 You must ensure that your entry in THA's register of interests is complete, accurate and up-to-date.

B3 You must comply with THA's policies and procedures relating to the application for employment or housing from members of staff, board and committee members, involved residents or others to whom they are related or closely connected. (The Society's policies and procedures are designed to ensure, and to demonstrate, that no preferential consideration is given to any such application).

B4 You must not be involved in the appointment of staff where you are related, or are closely connected, to an applicant. You must declare any such relationship to the appropriate person. You must not be involved in decisions relating to discipline, promotion, pay or benefits for any member of staff to whom you are related or closely connected.

B5 You must not be involved in the appointment of a contractor or supplier where you are related, or closely connected, to an organisation or individual applying or tendering for a contract. You must declare any such relationship to the appropriate person. You must not be involved in establishing the terms of a contract, or its ongoing monitoring and management, where you are related, or closely connected, to the contractor or supplier.

B6 Except where specifically permitted, you must normally avoid using THA's contractors and suppliers for private purposes. Where this is unavoidable, you must not receive a favourable service as a result of your connection with THA. Prior approval must be sought before using the supplier or contractor and a written declaration made confirming that no financial or other advantage has been secured as a result of the relationship with THA.

B7 You must not use, or attempt to use, your position to promote your personal interests or those of any connected person, business or other organisation.

C: BRIBERY, GIFTS AND HOSPITALITY

Main principle

You must not offer, seek or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisations.

Provisions

C1 You must comply with the law and THA's policies and procedures in relation to:

- (1) bribery and corruption; and
- (2) the giving, receipt, approval and recording of gifts and hospitality.

C2 You must not canvass or seek gifts or hospitality or other benefits.

C3 If you are offered gifts or hospitality, they should either be declined, or prior approval sought for their acceptance. The only exceptions are gifts of token value or modest hospitality given in connection with normal work meetings. The Society's policies give further guidance.

D: FUNDS AND RESOURCES

Main principle

You must not misuse THA's funds or resources.

Provisions

D1 You must comply with THA's policies and procedures regarding the use of its funds and resources. 'Resources' includes staff, information, telephone, computer and other IT facilities, equipment, stationery and transport.

D2 You must ensure that the organisational funds and resources entrusted to you are used efficiently, economically and effectively.

D3 You must comply with THA's policies and procedures regarding procurement, ensuring value for money and fairness in decision-making.

D4 You must take reasonable measures to protect THA's funds, resources, property and assets from theft, damage and misuse.

D5 You must comply with THA's policies and procedures relating to the acceptable or unacceptable use of email, intranet and internet services. Amongst other things, these policies and procedures prohibit access to pornographic or racist material, and the use of unauthorised or unlicensed software.

D6 You must claim reimbursement only for expenditure that was properly and reasonably incurred in carrying out THA's business. You must ensure that any expenses claim you make is accurate and complies with THA's policies and procedures.

E: CONFIDENTIALITY

Main principle

You must handle information in accordance with the law and THA's policies and procedures.

Provisions

E1 You must comply with the provisions of the General Data Protection Regulations 2018 (GDPR) which governs the protection of personal data. All personal data held about residents and other service users, employees and others, whether on paper or electronically is subject to the regulations. The Society's policies and procedures give further guidance.

E2 You must not disclose without authority any confidential business information. This duty continues to apply after you have left THA or relinquished your position.

E3 You must not, without permission, pass or distribute to the press or media or any other external recipient(s) information or materials relating to THA.

E4 In your capacity as a board or staff member or involved resident, you must not, without prior authority:

- (1) appear to represent the views or position of THA;
- (2) write letters to the press or other recipient(s);
- (3) write media articles, blog posts or tweets etc., about THA and its activities;
- (4) make comments or statements to the media – if approached you must pass the enquiry to the appropriate person.

E5 You must not prevent another person from gaining access to information to which they are entitled by law.

F: RESPECT FOR OTHERS

Main principle

You must treat others with respect at all times.

Provisions

F1 You must comply with the law and with THA's policies and procedures relating to equality and diversity. Equality laws prohibit discrimination on grounds including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and impose positive duties to eliminate unlawful discrimination and promote equality. The Society's policies give further guidance.

F2 You must not harass, bully or attempt to intimidate any person. The Society's policies give further guidance.

F3 You must not display materials in the workplace which other people might reasonably find offensive or use language which board or work colleagues or customers might reasonably find offensive.

G: RELATIONSHIP BETWEEN BOARD AND COMMITTEE MEMBERS, STAFF, VOLUNTEERS AND INVOLVED RESIDENTS

Main principle

Board and committee members, staff, volunteers and involved residents must maintain a constructive, professional relationship based on a sound understanding of their respective roles.

Provisions

Board and committee members

G1 You have a duty of loyalty and support towards THA and this must be reflected in a constructive, professional relationship with its staff and volunteers.

G2 You must not go beyond your role as a board or committee member and become inappropriately involved in operational matters.

G3 In your dealings with staff and volunteers, formally and informally, you must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the mission, vision, values, policies and objectives of THA.

Board and committee members and involved residents

G4 Where it is necessary to raise issues of poor staff performance at a formal meeting, these must be raised in a constructive way, aimed at getting things right in future, and not at criticising individuals. Any concerns about the performance of individuals must be discussed in confidence with the chair of the board, committee or panel, or with the chief executive.

G5 You must not appear to undermine the authority of a senior officer in his or her dealings with a more junior member of staff.

G6 You must avoid inappropriate personal familiarity with members of staff and volunteers.

G7 You must not ask or encourage a member of staff or a volunteer to act in any way which would conflict with compliance with this code or THA's policies and procedures.

Involved residents

G8 You must not seek to instruct or direct a member of staff or contractor. The relevant manager or member of staff must convey all instructions.

Staff members

G9 If your work brings you into contact with the board, a committee or a residents'/service users' committee or panel, you must:

- (1) take direction from the board, or in accordance with any delegated authority of a committee or panel;
- (2) respond constructively to questioning or challenge;
- (3) respond willingly to requests for information.

G10 You must avoid inappropriate personal familiarity with board and committee members, volunteers and involved residents.

G11 You must not use informal channels to lobby or influence board and committee members or involved residents on matters of THA's business.

G12 You must not knowingly mislead the board or any of THA's committees or panels. In presenting information, you must set out the facts and relevant issues truthfully.

H: RELATIONSHIP WITH RESIDENTS AND OTHER SERVICE USERS

Main principle

You must maintain high standards of professionalism, fairness and courtesy in all your dealings with residents and other service users.

Provisions

H1 You must treat all residents and other service users with courtesy and respect.

H2 You must not allow any personal relationship with a resident or other service user to conflict with your role and responsibilities.

H3 You must not give gifts or loans of money to, or receive loans or gifts of money from, residents or other service users.

H4 You must take great care in handling residents' and other service users' money, ensuring that a receipt is completed for every transaction.

H5 You must not invite or influence a resident or other service user to make a will or trust under which you are named as executor, trustee or beneficiary.

H6 When handling information relating to residents and other service users, you must comply with the law and THA's policies and procedures relating to the protection of personal data.

I: HEALTH, SAFETY AND SECURITY

Main principle

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

Provisions

I1 You must comply with THA's health and safety policies and procedures and bring to the attention of the appropriate person any risks to yourself or others. In particular:

- (1) where you are provided with protective clothing this must be worn; and
- (2) for your own safety, you must comply with THA's policy and procedures relating to lone working and safeguarding.

I2 You must comply with the law and THA's policies on smoking and on the use of alcohol, illegal drugs and other substances.

I3 You must comply with THA's policies relating to the security of premises.

J: CONDUCT AT MEETINGS

Main principle

Your conduct at meetings must show respect for all, and comply with THA's standards.

Provisions

J1 You must be courteous to all other attendees, and respect the position of the meeting chair.

J2 You must not use threatening or aggressive behaviour, or act in a disruptive way.

J3 You must not attend meetings while intoxicated or under the influence of drugs.

J4 Once a board, committee or panel meeting has properly reached a decision, you must share responsibility for that decision, even where you had not supported it.

K: REPRESENTING THE SOCIETY

Main principle

In representing THA at external events and in dealings with outside bodies, you are an ambassador for THA and must uphold and promote its mission, vision, values, objectives and policies.

Provisions

K1 You must not become involved in, or be seen to endorse, any activity that may bring THA into disrepute. This includes but is not limited to illegal, immoral, racist or other discriminatory activity.

K2 In engaging in activities which promote the work of THA to the outside world, you must demonstrate commitment to THA and support for its mission, vision, values, policies and goals.

K3 In representing THA at formal or informal events, you must be appropriately dressed for the occasion.

L: LEARNING AND DEVELOPMENT

Main principle

In partnership with THA, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

Provisions

L1 You must play an active part in THA's supervision and performance appraisal processes and welcome constructive feedback.

L2 At the appropriate induction, appraisal or supervision meeting, you must make clear your personal training and development needs, so that they can be taken into account in THA's forward budgeting and planning.

L3 Unless there are exceptional reasons, you must attend all learning and development events that have been arranged, either for you alone or as part of a group.

Board and committee members

L4 You must take responsibility for keeping your knowledge up to date in those areas in which you are a specialist.

M: REPORTING CONCERNS

Main principle

You must report to the appropriate senior person within THA any reasonable and honest suspicions you may have about possible wrongdoing.

Any failure to comply with this Code of Conduct may result in disciplinary action, the severity of which will depend on the nature and extent of the violation. Disciplinary actions may include verbal or written warnings, suspension, or termination of employment or involvement with THA. The specific procedures for handling violations and the corresponding consequences will be outlined in THA's Disciplinary Policy, accessible to all stakeholders.

Provisions

M1 If you are aware of potentially dishonest or fraudulent activity, or material breaches of this code – by board and committee members, staff, volunteers or others – you must report it to the appropriate senior person within THA. The Society's policies and procedures relating to fraud and confidential reporting (whistle-blowing) give further guidance.

M2 If you believe that you are being required to act in a way which conflicts with this code, you must report it to the appropriate senior person within THA.

M3 You must not victimise any person who has used – or intends to use, or is suspected of having used – THA's confidential reporting procedures to report the misconduct, or alleged misconduct, of others.

N: REGULAR REVIEWS

Main principle

THA is committed to ensuring the relevance and effectiveness of this Code of Conduct. To uphold this commitment, the policy will undergo a thorough review at least once every two years. This review will consider changes in industry standards, legal requirements, and organisational dynamics. Any necessary updates will be communicated to all stakeholders, and the revised Code will be made readily available through THA's official channels.

APPENDIX A

To be updated with the most recent version of the National housing federation Code of Governance.



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