

Code of Conduct for Board Members, Colleagues and Involved Residents

1 Purpose

MTVH has chosen to adopt and comply with the National Housing Federation (NHF) Code of Conduct 2022. This has been adapted and re-branded to create the MTVH Code of Conduct, which reflects the requirements, principles and expectations set out within the NHF Code.

Compliance with this Code of Conduct is a requirement within the employment contract of all MTVH colleagues.

Mel Barrett Chief Executive, Metropolitan Thames Valley Housing

This Policy sets out MTVH's expectations regarding the conduct of its Board Members, Colleagues and Involved Residents whilst they are working and engaging with, and on behalf of, MTVH.

The content of this MTVH Code of Conduct (the Code) substantially mirrors the NHF Code of Conduct 2022 and reflects its principles, expectations and requirements. It has been adapted to reflect the MTVH's values and behaviours expected of all board members, colleagues and involved residents.

It is vital for the reputation of social housing that everyone who works for, or represents, a housing association is held to the highest standards of conduct. The NHF Code of Conduct sets out the standards appropriate for housing associations that are members of the NHF. It relates to individual colleagues, board and committee members and certain residents involved. MTVH is a member of the NHF and has already adopted the NHF's Code of Governance (2020), which is a companion document to this Code.

Compliance with this Code

The Code covers the conduct of individuals. It has been presented to the board in full and a formal resolution has been recorded confirming its adoption, including who the code applies to. The code is available to all of those it covers on the Hub (for colleagues), on the website (for involved residents) and via MTVH's Governance and Risk platform (for board and committee members). This ensures transparency and sets out the expectations which our customers and other stakeholders can expect from us.

Compliance with the Code will be reported to the Board annually as part of the Annual Assurance Report and records of individual non-compliance with the Code will be recorded through our standard HR policies and procedures.

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2 The Code

The responsibilities of the housing association's board

The board of MTVH is ultimately responsible for the actions, policies and work of the MTVH Group. It is their responsibility to make sure that all those concerned can comply with this Code.

The boards and senior colleagues of MTVH have a responsibility to set an appropriate framework of policies, delegations and procedures. A culture is in place which enables and supports all individuals to meet their responsibilities, as set out in the Code, and deliver the best possible service for our customers.

Arrangements are in place for people to ask for the further information or guidance they may need about the application or detail of this Code. Throughout this Code a number of other Policies and Procedures are referenced and these may be found on the Hub.

Who does the Code apply to (Scope)

The Code sets standards of conduct for everyone who is involved in the work of MTVH. This includes colleagues, board and committee members and involved residents. Involved residents refer to our residents or customers who sit within the MTVH board governance structure, on our customer council and other customer forums and/or who volunteer alongside MTVH within their communities.

The Code applies to all permanent colleagues and to those on temporary contracts; and to those who have a service agreement relating to board, committee, council, forum or voluntary service. The Code equally applies to our residents who are also employed of MTVH. If an individual to whom the Code applies has a contract of employment or service agreement, and there is a conflict between the contract or agreement and this code, the contract takes precedence.

The Board has decided that this Code applies to colleagues employed by subsidiaries within the MTVH Group. Although this Code does not cover those employed by MTVH's joint venture partners, there is an understanding that those organisations will have a code of conduct in place with similar principles.

Terminology used in this Code:

- 'Board' includes the MTVH board and any subsidiary boards.
- 'Board member' includes all members of MTVH governing bodies whether they are non-executive directors, trustees or board members. It includes co-optees and any other nominees, whether they enjoy voting rights and whether they are remunerated for their services.
- 'Colleague' includes MTVH's employees and any other persons fulfilling the role of a paid employee, such as those deemed to be workers, interim placements, or those on secondment from another organisation.
- 'Committee member' includes all members of committees and/or panels who are not members of the MTVH board.
- 'Contractors' includes those other than board members, colleagues and involved residents who are directly involved in delivering the housing association's services and business activities. This includes contractors, sub-contractors, consultants and agents.
- 'Involved resident' includes residents and other customers (as defined below) who are formally involved in delivering, or scrutinising, MTVH's business activities. This includes those who attend board or committee meetings and/or are members of a committee or the Customer Council, or another MTVH customer forum.
- 'Known relationship' for the purposes of this code means related parties and close connections, it is not envisaged that relationships with acquaintances should be covered by this term.
- 'Microaggression' is a term used for brief and commonplace verbal, behavioural or environmental slights that may communicate hostile, derogatory, or negative attitudes towards certain groups of people.
- 'People with whom they are closely connected' in broad terms, means family, relatives or business partners as well as businesses in which they have an interest through ownership or influence. The term includes spouse or unmarried partner or civil partner, parents, children, siblings, grandchildren and grandparents.
- 'Residents and customers' includes residents, tenants, leaseholders, shared owners and users of services provided by MTVH.
- 'You' for the purposes of this code means all those individuals to which the code applies, as defined above.

PART I: Acting in the best interests of MTVH and its residents and customers

You have a responsibility to discharge your role in line with the purposes, values and strategic objectives of MTVH, which are set out in the MTVH Strategy.

A. Meeting your responsibilities

The principle

You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of MTVH and for the delivery of its strategic objectives.

- A1 You must always try to fulfil the requirements of your role to the best of your ability. If any circumstances arise that limit your ability to meet your responsibilities, you must raise this with your line manager.
- A2 In carrying out your role, you must always seek to further MTVH's strategic objectives, reflecting MTVH's desired culture.
- A3 You must act in a way that does not discriminate against, or unjustifiably favour, particular individuals, groups or interests, including on the basis of any protected characteristics they may have, refer to the **Equality, Diversity, and Inclusion (EDI) Policy**.

- A4 You must consider the impact of your actions on the safety and wellbeing of residents, refer to the **Occupational, Health, Safety & Environmental Policy Statement**.

Expected of board and committee members

- A5 You must respect the principle of collective decision-making and corporate responsibility.
- A6 You must ensure that you declare to MTVH any relevant personal relationships, employment and other appointments you hold, and that these do not interfere with your ability to perform or conflict with your role as a board or committee member, information can be found in the **Declaration of Interests Procedure**.

Expected of colleagues

- A7 You must seek approval before accepting an external paid or voluntary role where this could potentially interfere with your existing job, conflict with the terms set out in your contract of employment or which could present a potential or perceived conflict of interest or reputational risk to MTVH. If an external role is remunerated, Chief Executive approval is required with a recommendation from your line manager. Additional guidance is provided within the **External Roles Procedure** and the **Declaration of Interests Procedure**.

B. Representing MTVH

The principle

Expected of all

- B1 In representing MTVH, you must act in accordance with its values, policies and goals.
- B2 You must conduct yourself in a manner that does not bring MTVH into disrepute.
- B3 You must not make derogatory, false or otherwise damaging comments, in person or through any medium, about MTVH or any person, service or organisation connected with it.
- B4 You must have prior authority to officially represent the views or position of MTVH.
- B5 You must apply caution act responsibly in the use of email, intranet and internet services including social media and comply with MTVH's policies, refer to the **Social Media Policy**.
- B6 When representing MTVH through any medium, including social media, you must at all times act with professionalism.
- B7 Where any personal social media accounts refer to your role with MTVH, you must make it clear in what capacity you are communicating.
- B8 If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect MTVH, you must obtain prior consent. Such consent will not be unreasonably withheld unless your activity poses a material risk to MTVH, for more information see the guidance on the Hub accompanying this Code.

PART II: Behaving with integrity

The reputation and good name of MTVH depends on compliance with this Code, and with the laws, policies and procedures that it refers to. The integrity of those involved needs to be, and seen to be, beyond doubt.

C. Conflicts of interests

The principle

You must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between your duties to MTVH and your personal interests, other duties and relationships.

Expected of all

- C1 You must formally declare to MTVH, at the earliest opportunity, any interests which may, or may be perceived to or may in the future, conflict with the duties of your role. Refer to the **Declaration of Interests Procedure**.
- C2 You must declare any known relationship to a person applying for or performing a role within MTVH and must not be involved in their appointment, performance management or reward.
- C3 You must declare any known relationship to a resident, potential resident or other customer of MTVH. You must not be involved in decisions relating to their relationship with MTVH or seek or accept preferential treatment for them.
- C4 You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to MTVH and must not be involved in their appointment, performance management or payment.
- C5 Except where specifically permitted, as set out in MTVH's relevant policy, you must avoid using its contractors and suppliers for private purposes.
- C6 You must not use, or attempt to use, your position to promote personal interests or those of any connected person, business or other organisation for personal gain.

Expected of board and committee Members

- C7 Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or long-standing, and in the opinion of the board cannot be managed appropriately see **Declaration of Interests Procedure**.

D. Bribery, gifts and hospitality

The principle

In your role with MTVH, 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. You must not seek or accept preferential treatment in the provision of benefits such as housing accommodation or employment.

Expected of all

- D1 You must not solicit or seek gifts or hospitality or other benefits, refer to the **Anti-Fraud, Bribery and Corruption Policy**.
- D2 Any gifts or hospitality offered to or by you must be either declared or declined according to MTVH's policies. Please refer to the **gifts and hospitality reporting procedure**.
- D3 If you are offered a bribe, hospitality or a gift, which is or may be in return for expected preferential treatment, you must decline and declare this immediately as set out within the **Anti-Fraud, Bribery and Corruption Policy and associated Fraud Response Procedure**.

E. Funds, resources and personal benefit

The principle

You must not misuse MTVH's funds or resources or seek preferential treatment for your own personal benefit.

Expected of all

- E1 You must ensure that MTVH's funds and resources are used properly and efficiently.
- E2 Your procurement decisions must be guided by MTVH's policies and fairness in decision-making and in line with MTVH's **Financial Control Framework** and the relevant law.
- E3 You must take all reasonable measures to protect MTVH's funds, resources, property and assets from fraud, theft, damage and misuse see **Anti-Fraud, Bribery and Corruption Policy**.
- E4 If you claim reimbursement for any expenses or overtime you must do so in line with MTVH's policies and procedures.

F. Confidentiality

The principle

You must process information in accordance with the law and MTVH's policies and procedures.

Expected of all

- F1 You must not disclose, without authority, any personal data about board or committee members, residents or customers, or colleagues. You must follow the MTVH **Data Protection Policy** and procedures.
- F2 You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left MTVH or stepped down from your position.
- F3 You must not, without authority, pass or distribute to the press or media or any other external recipient(s) any unpublished information or materials relating to MTVH, unless you are doing so in accordance with MTVH's **Whistleblowing Policy** and procedure.
- F4 You must not prevent another person from gaining access to information to which they are entitled to by law.

G. Reporting concerns

The principle

You must report to the appropriate person within MTVH any reasonable suspicions you have about possible wrongdoing in line with MTVH's relevant policies and procedures.

Expected of all

- G1 If you have a concern about possible wrongdoing, you must immediately report it via the appropriate internal channel or external body. This includes becoming aware of potentially dishonest or fraudulent activity, and material breaches of this Code or relevant legislation including health and safety. Relevant reporting channels are set out within the **Whistleblowing Policy** and procedure, the **Anti-Fraud, Bribery and Corruption Policy** and Fraud Response Procedure and the **Safeguarding Policies**.
- G2 If you believe that you are being required to act in a way which conflicts with this Code or legislation, you must immediately report it via the appropriate channel.

- G3 You must not victimise or disadvantage any person who uses or intends to use MTVH's whistleblowing procedures to report actual or alleged wrongdoing.

PART III: Conducting yourself professionally and treating others well

Professionalism, consideration and respect for others, and a commitment to the principles of equality, diversity and inclusion, are fundamental to the delivery of social purpose.

H. Respect for others

The principle

You must treat all others with respect and consideration.

Expected of all

- H1 You must treat everyone you meet in the performance of your role with respect, care and consideration. See **Equality, Diversity, and Inclusion (EDI) Policy**.
- H2 You must show respect for individuals' chosen identities.
- H3 You must promote, through your own behaviours, MTVH's organisational culture that is welcoming, accepting and accommodating to people of all backgrounds, cultures and personal and protected characteristics.
- H4 You must not harass, bully or attempt to intimidate any person, or use threatening or aggressive behaviour or other discriminatory behaviours. You must seek to avoid microaggressions in your speech and behaviour. See the **Anti Bullying, Harassment and Sexual Harassment Policy**.
- H5 You must not display materials in your workplace or use language in the performance of your role which other people might reasonably find offensive.
- H6 You must report through appropriate channels any instances of unfair or unequal treatment in the workplace and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and respecting confidentiality.

I. Working with residents and other customers

The principle

You must be professional, fair and courteous in all your dealings with residents and other customers.

Expected of all

- I1 You must seek and value views from residents and other customers when making decisions that will affect them, refer to the **Customer Voice Framework**.
- I2 Where it is not practicable to avoid providing a product or service to someone you have a personal relationship with. You must not allow the personal relationship with the resident or other customer to influence how you discharge your role and responsibilities.
- I3 You must not give personal gifts or money or loan money to or receive personal gifts or money from, residents or other customers. However customers who contribute to the business ie via committees, panels and forums, where this is not covered in the service agreement may be given gift vouchers/tokens to recognise this contribution, in this case they don't need to be recorded in the gifts and hospitality register.
- I4 You must handle customer's money only where necessary and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with MTVH's

financial policies, procedures and controls to ensure appropriate handling of any and all funds, refer to **Supporting Customers with Money Procedure**.

- I5 You must not invite or influence a resident or other customer unless they are a person who you are closely connected to, to make a will or trust under which you are named as executor, trustee or beneficiary.
- I6 You must maintain clear professional boundaries with customers at all times, with careful consideration given to the impact of your actions and behaviours on trust, safety and wellbeing.
- I7 You must appropriately record all customer contact clearly and factually, refer to the **Customer Contact Policy** and related procedures and guidance.

J. Professional relationships

The principle

Board members, colleagues and involved residents must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.

Expected of all

- J1 You must not ask or encourage anyone to commit wrongdoing, including any breach of this Code.

Expected of board and committee members

- J2 Your relationships with colleagues and involved residents must be constructive and professional.
- J3 You must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies and objectives of MTVH.

Expected of board and committee members and involved residents

- J4 Where it is necessary to raise issues of colleague, board or contractor performance, these must be raised constructively and through the appropriate channels.
- J5 You must not undermine or appear to undermine the authority of a senior colleague in their dealings with a more junior colleague.
- J6 You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with colleagues.
- J7 Unless you have specific and, where practicable, written delegated authority to do so, you must not individually give instruction or direction to any colleague or contractor.

Expected of colleagues

- J8 You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding, in a professional setting, inappropriate personal familiarity with colleagues, board and committee members and involved residents.
- J9 You must not use informal channels to lobby or influence board members or involved residents on matters of MTVH's business.
- J10 You must not knowingly mislead the board or any of MTVH's committees or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.

K. Learning and development

The principle

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

Expected of all

- K1 You must play an active part in MTVH's supervision and performance management processes as applying to you.
- K2 You must offer open and constructive feedback to others and invite feedback about your own performance.
- K3 You must carry out your role to the best of your ability, ensuring that you meet the competency requirements set out within the role specification. You must engage with both mandatory and other relevant training and, if not already qualified, seek to gain the appropriate qualifications as required within the role specification.
- K4 You must make your personal training and development needs relevant to your role known to MTVH.
- K5 Unless there are exceptional reasons, you must attend learning and development events as required.

Expected of board members:

- K6 You must keep your knowledge up to date in those areas in which you are a specialist, as well as keeping abreast of any matters relating to MTVH and the wider housing sector.

PART IV: Protecting yourself, other people and the environment

You have a responsibility when performing your role to protect your own health, safety, security and wellbeing and that of others, and to minimise harmful environmental impacts.

L. Health, safety and security

The principle

Your conduct, actions and decision making must promote the health, safety, security and wellbeing of yourself or others.

Expected of all

- L1 You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk. You should read and understand MTVH's Health & Safety Policy and procedures, as they relate to your area of the business. See **Occupational, Health, Safety & Environmental Policy Statement**
- L2 If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or a group of individuals connected with MTVH, you must report this immediately through the appropriate channels.
- L3 You have a responsibility to report any and all Health and Safety Incidents that you witness or are notified of in your role.

M. Protecting the environment

The principle

Within your role at MTVH, you must strive to avoid or reduce possible negative environmental impacts.

Expected of All

- M1 In carrying out actions or making decisions in the performance of your role, you must consider the environmental impact of your decisions and where you are able, actively seek to achieve positive environmental outcomes.

Expected of board and committee members

- M2 You should consider the long-term environmental impact of your decisions.

3 Background legislation

MTVH is required to comply with the Regulator of Social Housing's Regulatory Standards. The Governance & Financial Viability Standard includes the requirement to 'adopt and comply with an appropriate code of governance'. MTVH has chosen the NHF Code of Governance and provides evidence of compliance annually. The NHF code of governance requires that 'the board adopts a formal code of conduct to which all its members adhere'. The MTVH Board has resolved to adhere to the NHF Code of Conduct. Through the adoption of and compliance with this MTVH Code of Conduct we can provide assurance that we are meeting these regulatory requirements.

4 Our commitment to Equality, Diversity, and Inclusion

In implementing this policy MTVH will not discriminate against any colleague, customer, or stakeholder on the grounds of their sex, sexual orientation, gender reassignment status, ethnic origin, age, religious belief, disability, marital status, and pregnancy/maternity.

An Equality Impact Assessment has been completed for this Policy and is retained by the Policy Team.

5 Key Policy Information

Policy Owner	Chief Executive
Author	Head of Governance & Compliance
Approved by	The MTVH Board
Effective from	March 2026
Approach to review	This Policy & associated Procedures will be reviewed if legislation, regulatory changes of operational need requires. Any amendments will be appropriately consulted on and signed off before being clearly communicated to customers and colleagues.
This is a controlled document maintained and accessible via MTVH's intranet, The Hub. When viewed outside of the intranet, this document should be checked against the master copy held by MTVH to verify that it is the current version, or it shall be considered uncontrolled.	