

Code of Conduct for Board and Committee Members, Colleagues and Involved Residents

1 Purpose

This code of conduct sets out the standards of behaviour and conduct expected from you as someone involved in planning and delivering our business and governance. It applies to board and committee members, as well as colleagues and involved residents.

The code gives guidance on how to ensure your actions and behaviour are consistent with our values, and the very high standards of personal conduct we expect to maintain confidence in our business and reputation.

You must ensure you are familiar with this code and always act, and be seen to act, in accordance with its provisions in everything you do. The expectations are clear and reasonable, and if you do not comply with the code this will be treated as an employment or governance disciplinary matter.

This code follows and includes all provisions in the NHF Code of Conduct 2012

If you have any doubts or questions about the code please speak to the Governance and Compliance team.

2 The Principles

2.1 Your general responsibilities

You must fulfil your duties and obligations responsibly, acting in good faith and in the best interests of the association, its residents and other users. This means:

You must comply with the law, your terms of appointment and the association's policies and procedures.

You must not act or behave in a way which could reasonably be thought to bring our reputation into disrepute. This includes activities with other groups or organisations whose values are not consistent with ours, and applies to all your activities including those outside your work with us.

You must not bring our name, reputation or integrity into disrepute by your actions, words or behaviour. This includes statements made in person, social media and on other public or personal sites. You should not make negative or derogatory comments about the association, or its users, stakeholders, partners or services. This applies even if we are not named, but where your or our identity can reasonably be inferred.

You must not act or behave in a way which inappropriately favours or discriminates against any individuals, groups or interests.

You must use the right channels for handling service provision issues, and must not act outside of our normal procedures.

You must not misuse your position, for example by using information you have acquired as part of your role to further your private interests - or the private interests of others.

You must respect the principle of collective decision-making and corporate responsibility. This means that once the Board, committee or other group has reached a decision, you must support this in your subsequent actions and behaviours.

You must not engage in political or campaigning activity that might reasonably compromise the position of the association. Board members or involved residents intending to stand for political office must discuss this first with their chair; and colleagues with their line manager.

If you are a Board member who takes up new employment or appointments, you should immediately make any resulting declarations of interest, and any such work or position must not interfere with your role as a board member.

If you are a colleague you must consult your manager first before taking on any outside work or any position, paid or unpaid. Any such work or position must not interfere or conflict with any interests in your current job or the association.

2.2 Conflicts of interests

2.2.1 General

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

You must ensure your entry on the association's register of interests is fully complete, accurate and up-to-date. This is normally done annually using a Declaration of Interests form, and an example is set out at the end of this code. Any changes throughout the year must be declared immediately.

You must comply with policies and procedures for declaring, recording and handling a potential or apparent conflicts of interest.

You must comply with policies and procedures relating to the application for employment or housing from colleague, board members, involved residents or others where you are related or closely connected.

You must not be involved, or to give the appearance of being involved, in the appointment, promotion, pay, benefits or performance management of colleagues, board members, involved residents or others where you are related or closely connected.

You must not be involved, or give the appearance of being involved, in the contract tendering, appointment, negotiation or monitoring for any individual, contractor or supplier where you are related or closely connected.

You must declare any such relationships to your line manager, and this should be included on your Declaration of Interests form if appropriate.

As a default position, you should declare any interests where you think there is even a remote possibility there may be an actual or apparent conflict between your duties and personal interests.

You should normally avoid using the association's contractors and suppliers for private purposes. Where this is unavoidable, you must first get approval from the Head of Governance and Compliance and this should be updated on your Declaration of Interests form. You must never receive a favourable service as a result, and if you do this will be a breach of the Code of Conduct.

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.

2.2.2 Additional provisions for Common Board members

A board member must always act in the interests of the organisation of which he or she is a board member. If a board member of one organisation is also on another Board, then there is always a potential for a conflict of interests. This will affect the Common Board members of TVHA and MHT, although situations where their interests materially diverge should be rare.

The rules of TVHA and MHT state that no Common Board member will be deemed to have a conflict of interest just by being a board member of another entity within the business group. For items of business where there is no potential conflict, the Common Board can operate as normal.

Each Common board member is, however, always obliged to fulfil their duties for each separate board, and any conflict of interest must be handled appropriately.

Where a decision affects both TVHA and MHT, but there is no substantial divergence of interest or disagreement between TVHA and MHT, the board members can rely on the provisions of the rules which say that there is no deemed conflict for a Common Board member.

If a situation arises, however, in which the interests of two (or more) boards are potentially in conflict, the Chair must ensure decisions are taken properly and in the best interests of each board. The Board Terms of Reference document sets out the process to be followed.

2.3 Bribery, gifts and hospitality

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

You must comply with the law and the association's policies and procedures in relation to bribery and corruption, and in the giving, receipt, approval and recording of gifts and hospitality.

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

If you are offered gifts or hospitality they may be accepted where there is a business reason – for example, to build business relationships or developing future business opportunities.

In all cases, approval should be sought from your line Manager and this should be declared in the Gifts and Hospitality Register.

The exceptions to the above are where the gifts are of token value, or where modest hospitality is connected to normal day to day work. Our Fraud, Anti-Corruption and Bribery policy gives further guidance, and if in doubt speak to the Head of Governance and Compliance for advice.

2.4 Funds and resources

You must not misuse the association's funds or resources. This means:

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

You must ensure funds, resources, properties and assets managed by you are used efficiently, economically and effectively. You must also take reasonable steps to ensure they are protected from theft, damage and misuse.

You must also comply with our policies and procedures regarding procurement, ensuring value for money and fairness in decision-making.

You must comply with our policies and procedures relating to the acceptable use of email, intranet and internet services, and to the security and integrity of our systems and infrastructure.

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

2.5 Confidentiality

You must handle information in accordance with the law, and the association's policies and procedures. This means:

You must comply with the Data Protection Act 2018 and General Data Protection Regulations 2018, which govern the protection of personal data.

All personal data held about service users, employees and others (whether on paper or electronically) is subject to the acts, and the association's policies and procedures give further guidance.

You must not disclose without authority any confidential business information. This duty still applies after you have left the association.

You must not, without permission, pass or distribute to the press, media or any other external recipient information or materials relating to the association.

In your capacity as a board member, colleague or involved resident, you must not do the following without getting permission beforehand: appear to represent the views or position of the association;

write letters to the press or other recipients;

write articles, blog posts or tweets about our business or activities;

make comments or statements to the media – if approached you must pass the enquiry to the Communications Team immediately.

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

2.6 Respect for others

You must always treat others with dignity and respect. This means:

- You must comply with the law and our policies relating to equality, diversity and inclusion, and dignity at work. These prohibit discrimination on any grounds - including sex, age, race, disability, gender reassignment, marriage/civil partnership, pregnancy and maternity, religion or belief, and sexual orientation.
- Our quality, diversity and inclusion policies also mean you have positive duties to eliminate unlawful discrimination and to promote equality.
- You must not harass, bully or attempt to intimidate any person at any time.
- You must not discuss topics or display materials in the workplace which other people might reasonably find offensive.
- You must not use language, express views or display materials which other people might reasonably find offensive.

Our policies give further guidance, but if you need any more help or information speak to the Head of Governance and Compliance.

2.7 Relationship between board members, colleagues and involved residents

Board members, colleagues and involved residents must maintain a constructive and professional relationship, and a sound understanding of their respective roles. This means:

2.7.1 Board members:

- You have a duty of loyalty and support towards the association, and this must be reflected in a constructive, professional relationship with its colleagues and involved residents.
- You must not go beyond your role as a board member and become inappropriately involved in operational matters.
- In your dealings with colleagues, formally and informally, you must set an example by demonstrating the highest standards of personal integrity and ethics, and in your alignment with the values, policies and objectives of the association.

2.7.2 Board members and involved residents:

- Where it is necessary to raise issues of poor colleague performance at meetings, this must be done in a constructive and non-personal way. Your aim should be for us to be getting things right in future, and not at criticising individuals.
- Any concerns you have on the performance of individuals must only be discussed in confidence with the chair of the board, committee or panel, or with the chief executive.
- You must not appear to undermine the authority of a senior officer in his or her dealings with a more junior colleague.
- You must avoid inappropriate personal familiarity with colleagues.
- You must not ask or encourage a colleague to act in any way which would conflict with compliance with this code or the association's policies and procedures.
- You must not seek to instruct or direct a colleague or a contractor. The relevant manager or colleague must convey all instructions.

2.7.3 Colleagues:

If your work brings you into contact with the board, committee or a residents'/service users' committee or panel, you must: be open, transparent and professional at all times;

respond positively and constructively to any question or challenge;

respond positively to requests for information;

take direction in accordance with their delegated authority;

avoid inappropriate personal familiarity.

- You must not use informal channels to lobby or influence board members or involved residents on matters of the association's business.
- You must not knowingly mislead the board or any committees or panels. In presenting information, you must be open, transparent and truthful.

2.8 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. This means:

- You must treat everyone you deal with courtesy, dignity and respect.
- You must not allow any personal relationship with a resident or other service user to conflict, or be perceived to conflict, with your role and responsibilities.
- You must not at any time give gifts or loans of money to, or receive loans or gifts of money from, residents or other service users.
- You must take great care in handling residents' and other service users' money, ensuring that the cash handling procedure is followed.
- 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.

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

2.9 Health, safety and security

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

- You must comply with our Health and Safety policies and bring to the attention of the appropriate person any risks to yourself or others.
- Where appropriate, you must use protective clothing and equipment (PPE) where provided, and comply with our lone working policy.
- You must comply with the law and the association's policies on smoking and on the use of alcohol, illegal drugs and other substances.
- You must comply with the association's policies relating to the security of premises.

2.10 Conduct at meetings

Your conduct at Board and any other meetings must meet a high standard of personal integrity, commitment and courtesy. This means:

- Your conduct at meetings must show respect for all, and comply with the high standard of personal conduct and behaviour expected under this code.
- You must be courteous to everyone, regardless of their position or status.
- You must never use threatening or aggressive behaviour, or act in a disruptive or uncooperative way.
- You must not attend meetings while intoxicated or under the influence of drugs.
- 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.

2.11 Representing the association

- In representing the association at events and in your dealings with outside bodies, you must uphold and promote our values, objectives and policies. This means:
- You must not become involved in, or be seen to endorse, any activity that may bring the association into disrepute. This includes - but is not limited to - illegal, immoral, racist or other discriminatory activity.
- In engaging in activities which promote the work of the association to the outside world, you must demonstrate commitment to the association and support for its values, policies and goals.
- In representing the association at formal or informal events, you must be appropriately dressed for the occasion.

2.12 Learning and development

You must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge. This should be done in partnership with us and with our support. This means:

- You must play an active part in your own performance appraisal and welcome constructive feedback.
- You must play an active part in your own personal training and development.
- You should attend all learning and development events that have been arranged.
- You must take responsibility for keeping your knowledge up to date in such manner and to such extent as is in each case appropriate to enable you to execute your particular role within the organisation

2.13 Safeguarding

Colleagues must demonstrate exemplary behaviour when providing service and assistance to all children, young people and adults at risk, in order to ensure their safety and welfare. The following sets out the expectations of all colleagues regardless of role or responsibility.

2.13.1 Colleagues will always:

- Always work in an open environment, avoiding private or unobserved situations. Where your role specifically requires one to one contact, then only carry out duties with the consent of the individual or their appointee and where working with children, their responsible adult. Be polite and courteous at all times and use only appropriate behaviour and language.
- Treat all customers with respect and dignity and always put their welfare and safety first.
- Be alert to the environment you are working in and discuss anything you see that concerns you, to your DSL (for example drug paraphernalia when young children are living in the household, pet faeces)
- If a child or adult is involved in an accident, request the assistance of another colleague as soon as possible, and call for medical assistance (following the relevant emergency procedures) and ensure you notify your Line Manager. If the parent or appointee/ carer is not present when the incident occurs, they should be contacted as soon as possible

2.13.2 Colleagues should never:

- Allow or engage in any form of inappropriate physical contact.
- Make sexually suggestive comments to a child, young person or adult at risk, even in fun, by any mechanism e.g. face-to-face, e-mail, phone, text or via social media.
- Reduce someone to tears as a form of control.
- Use any personal form of social media or personal mobile or other device to contact a child, young person or adult at risk unless this is agreed as part of your role and is done using our approved platforms and equipment.
- Fail to act upon and record any allegations made by an individual, their appointee or their parent or carer.
- Do things of a personal nature for an individual that they can do for themselves.

NB: It may sometimes be necessary for colleagues to assist children or adults at risk, particularly if they are young or are disabled. These tasks should only be carried out with the understanding and consent of the individual, their parents or appointee/ carer, and as part of agreed care plans. We have a culture of respect for all customers and colleagues and a

zero-tolerance approach to all forms of abuse, bullying, harassment or discriminatory behaviour. Breaches of the Safeguarding Code of Conduct are classed as disciplinary matters which will be addressed in the Disciplinary Procedure.

2.14 Reporting concerns

You must immediately report any reasonable and honest suspicions you may have about possible wrongdoing. This means:

- If you have concerns about any possible actual or potential wrongdoing, dishonest, or fraudulent activity, you must report it immediately to the Head of Governance and Compliance or your senior manager.
- If you have concerns about any possible actual or potential breaches of this Code of Conduct, you should report it immediately to the Head of Governance and Compliance or your senior manager.
- If you believe you are being required to act in a way which conflicts with this code, you must report it immediately to the Head of Governance and Compliance or your senior manager.
- You must not victimise any person who has used, intends to use, or is suspected of having used, the association’s Whistleblowing Policy to report the misconduct, or alleged misconduct, of others.

Our Whistleblowing, Fraud, Anti-Bribery and Corruption, and Anti-Money Laundering policies give further guidance. If you need any help or information on these, please speak to the Head of Governance and Compliance or your senior manager.

3 Key Information Procedure Owner	Governance & Compliance
Author	Governance & Compliance
Approved by	The Board
Effective from	Nov 2024
Approach to review	This Policy & associated Procedures will be reviewed every 3 years or sooner if legislation, regulatory changes or operational need require an earlier review. Any amendments will be appropriately consulted on and signed off before being clearly communicated to customers and colleagues.
Latest next review date	May 2025