

Code of Conduct

1.0 Introduction

- 1.1 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.
- 1.2 Southern Housing has adopted the National Housing Federation (NHF) Code of Conduct (2022) in its entirety.

This Code sets standards appropriate for housing associations that are members of the NHF (as Southern Housing is).

The four parts of the NHF Code of Conduct (2022) are:

- 1. Acting in the best interests of the housing association and its residents
- 2. Behaving with integrity
- 3. Conducting yourself professionally and treating others well
- 4. Protecting yourself, others and the environment.
- 1.3 The application of the NHF Code is supported by Southern Housing policies and procedures.

2.0 Who this Code applies to

- Southern Housing and all its subsidiaries
 - Southern Housing colleagues (whether permanent, fixed term, temporary, secondments full-time or part-time)
 - Board members (this includes non-executive directors, trustees, board members, committee members and co-optees)
 - Involved residents (who are formally involved in delivering or scrutinising Southern Housing's activities)
 - Contractors (including sub-contractors, consultants, and agents).
- For the purposes of this Code, the term 'you' includes all of those listed in 2.1. 'Our' or 'we' means Southern Housing.
- 3.0 PART 1 Acting in the best interest of the Housing Association and its residents
- 3.1 You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of the housing association and for the delivery of its strategic objectives:

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- We're committed to embedding the principles of equality and diversity within the workplace, governance structure, and the wider community in line with our Equality, Diversity and Inclusion Policy
- You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups, or interests
- Your conduct or instructions to others must not endanger the health, safety, or security of yourself or others in line with our <u>Health & Safety Policy</u>
- Board members must respect collective decision making and corporate responsibility, and declare interests that would interfere with your role as a board member
- Colleagues must consult their manager before taking any other paid or voluntary work that may interfere with their role at Southern Housing or conflict with terms set out in their contract of employment.
- In representing Southern Housing in any capacity, including at external events, in dealings with outside bodies and on social media, you are an ambassador for Southern Housing and must uphold and promote its values, objectives and policies:
- 3.2.1 You must comply with our Acceptable Use Policy.

3.2.2 Media enquiries and social media

- Anyone working for, or on behalf of, Southern Housing who is contacted by a journalist or the media must pass the enquiry immediately to the Communications Team. You should not give any information to journalists beyond the contact details for the Communications Team.
- You must not engage in discussions, or provide responses to the media, without first receiving appropriate briefing and permission from the Communications Team and appropriate director. The exception to this rule is the Executive Team, who are authorised to act as spokespersons for Southern Housing.
- If you see an item in the press or social media regarding Southern Housing you feel we should respond to, please contact the Communications Team immediately. This could include editorial, letters to the editors, columnists' pieces, and contributions from correspondents. You should not contact the media without getting approval from the Communications Team.
- Any use of social media must be respectful of Southern Housing's reputation and values, and you must be clear any opinions you express are your own. You are responsible for what you post and share online – this applies to all external and internal social media¹ channels (both Southern Housing's owned channels and your personal accounts). You must not

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¹ For the purpose of this Policy, social media is the interaction between people in which they create, share, or exchange information and ideas in virtual communities and networks. It may include (but not exclusively) blogs, wikis, social networking platforms such as X, Facebook, LinkedIn, WhatsApp, Instagram, podcasts, forums, message boards, or comments on websites and articles. It also covers the posting of usergenerated content (such as comments, photos, and videos) on internal social work platforms and tools such as Viva Engage (formerly known as Yammer) and our colleague intranet. This list is not exhaustive.

bring Southern Housing's name into disrepute or affect its integrity by your actions or words; this includes both Southern Housing's and your personal social media accounts.

- The Communications Team must approve the teams/individuals who can set up, manage, and post on external social media channels/pages in the name of Southern Housing or one of our subsidiaries.
- We ask that Southern Housing colleagues adhere to the Social Media Guidance prepared by the Communications Team when using social media in a work or personal capacity.

3.2.3 Political or other campaigning

If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect us, you must obtain prior consent. We won't unreasonably withhold consent unless your activity poses a material risk to us.

We are an impartial organisation and should not be viewed as having political bias. As such, you should be mindful of undertaking any activities which could be perceived as linking Southern Housing with any organisation or political party. You should not bring the organisation into disrepute at any point.

3.2.4 Board member conflicts

Individuals with a conflict should not take part in discussions and decisions relating to that conflict. They should be prepared to resign if the conflict is material or long-standing, and in the opinion of the Southern Housing Board cannot be managed appropriately.

4.0 PART 2 – Behaving with integrity

4.1 Conflicts of interest

You must take all reasonable steps to ensure no conflict arises, or could reasonably be perceived to arise, between your duties to the association and your personal interests, other duties, and relationships:

- You must declare any interests and conflicts related to your role with Southern Housing as per the Declaration of Interest Guidance and Declaration of Interest form
- Board members with a conflict should not take part in discussions and decisions relating to that conflict. They should be prepared to resign if the conflict is material or long standing, and in the opinion of the Board cannot be managed appropriately.
- Refer to the <u>Probity Policy</u> for rules relating to housing and employment of close connections and the use of suppliers.

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4.2 Bribery, gifts and hospitality

In your role with Southern Housing, 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.

Refer to the:

- Gifts & Hospitality Policy
- Anti-Fraud, Bribery, Corruption and Thefts Policy
- Anti-Money Laundering Policy.

4.3 Funds, resources, and personal benefit

You must not misuse Southern Housing's funds or resources, or seek preferential treatment for your own personal benefit:

- You must not misuse Southern Housing's funds, assets, or resources.
 When entrusted to you, you must ensure they are used efficiently, economically, and effectively in accordance with the agreed budget purpose and financial delegation for your role. Funds, assets, and resources should be protected from theft, damage, and misuse.
- You must comply with Southern Housing's policies and procedures relating to procurement, ensuring value for money and fairness in decision-making
- If you claim reimbursement for expenditure, it must be properly and reasonably incurred in line with Southern Housing's Expenses & Mileage Policy.

4.4 Allegations of impropriety or criminal activity

You must inform your line manager as soon as possible if you are subject to investigation for impropriety and/or illegal activities in your private life and/or activities not connected to Southern Housing.

You must inform your line manager as soon as possible if you are arrested, cautioned, or charged in relation to an indictable offence.

If you are required to drive as part of your role, you must inform your line manager if you are charged with a driving related offence.

4.5.1 Confidentiality

You must process information in accordance with the law and our policies and procedures:

When dealing with personal data, you must always comply with <u>Data Protection Act 2018</u>, <u>General Data Protection Regulation (UK-GDPR)</u> and our <u>Data Protection Policy</u>

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 You must not disclose, without authority, any confidential or sensitive business information. This also applies after you have left Southern Housing.

4.5.2 Confidentiality- recordings of meetings

- You should decline any request for recordings of external Southern Housing meetings in line with our recording of meetings guidance
- You must not record internal meetings between colleagues. Meetings recorded without the knowledge or permission of those present may be treated as grounds for disciplinary action. Please see Disciplinary Policy and recording of meetings guidance.
- Certain meetings may be recorded if there's a limited, identified need (e.g. for minute-taking purposes) with the agreement of all attendees. Please follow the dos and don'ts included in the recording of meetings guidance.

4.6 Reporting concerns

We need you to 'speak up' when you feel something is wrong, so we can we do something about it. You might not find it easy to report a concern but be assured you can raise genuine concerns without fear of victimisation, discrimination, or disadvantage. See the Whistleblowing Policy.

5.0 PART 3 – Conducting yourself professionally and treating others well

5.1 Respect for others

Treat all others with respect and consideration. You must:

- Treat everyone you meet in the performance of your role with equal respect, care, and consideration
- Show respect for individuals' chosen identities
- Promote and role model Southern Housing's culture and values
- Not harass, bully, or attempt to intimidate any person or use threatening or aggressive behaviour or other discriminatory behaviours
- Not display materials or use language that others find offensive
- Report any unfair or unequal treatment through the appropriate channels.

We have a zero-tolerance approach to harassment, bullying, discrimination, victimisation, or intimidation, nor will we tolerate violent or aggressive behaviour.

Supporting diversity and inclusion is fundamental to who we are as a business and we all have a part to play by working together, respecting others, and appreciating our differences.

We believe having a clear understanding of the needs of our customers, whatever their backgrounds or circumstance, is key to providing excellent customer service.

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5.2 Working with residents and other customers

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

- You are not permitted to accept legacies from Southern Housing residents, clients, or service users, unless the donor is related to you. Refer to the Gifts & Hospitality Policy.
- You must operate in accordance with our financial policies and procedures to ensure all funds are handled appropriately.

5.3 **Professional relationships**

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

- We recognise colleagues and governance members may begin a close relationship with another colleague or governance member during the course of their duties. To avoid any potential conflicts of interest, both parties should declare this using the Declaration of Interest form.
- Colleagues must not use informal channels to lobby or influence Board members or involved residents on matters of Southern Housing's business
- Colleagues must not knowingly mislead the Board, committees, subsidiary boards, or resident panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.

5.4 Learning and development

In partnership with Southern Housing, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge:

- You must complete all mandatory training as required
- You must keep your knowledge and skills up to date as required for your role
- You must play an active part in performance and appraisal processes that apply to you
- You must offer and be willing to receive constructive feedback.

6.0 PART 4 – Protecting yourself, other people, and the environment

6.1 **Health and safety**

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

 You must not knowingly put your own or others' health, safety, security, or wellbeing unnecessarily at risk

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- You must report any concerns about the health, safety, security, or wellbeing of anyone associated with Southern Housing through the appropriate channels
- It is a disciplinary offence to be on Southern Housing premises (in the office as well as working remotely) and/or carrying out official duties during working hours while under the influence of alcohol or non-medically prescribed drugs.

6.2 **Protecting the environment**

Within your role at Southern Housing, you must strive to avoid or reduce possible negative environmental impacts:

- In carrying out your duties, you must consider the environmental impact of your decisions and where you are able, seek to achieve positive environmental outcomes
- You should also consider the long-term environmental impact of your decisions.

7.0 Breaches of this Code of Conduct

- 7.1 You must comply with this Code of Conduct and all related Southern Housing policies and procedures.
- 7.2 We'll deal with breaches under the Disciplinary Policy for colleagues, or the *Breach Procedure for Governance Members*.
- 7.3 If you believe you are being required to act in a way that conflicts with this Code, you must report it to an appropriate senior manager, your line manager, or a director within Southern Housing.

8.0 Review

8.1 We'll review this Policy every two years to incorporate legislative, regulatory, best practice developments, or address operational issues.

Policy controls

Version 1.2 – effective 28 August 2024

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