



NFTMO

The National Federation of
Tenant Management Organisations



Code of Conduct - Employees

Introduction

Estate Management Boards, registered social landlords (RSLs), housing companies, and local authorities receive substantial public funds, and provide a key human service. Their residents and the public are entitled to expect the highest standards of conduct from all employees who work for social landlords. This Code provides guidance to assist you in your work at the EMB.

The Code is produced in the light of the challenges facing those who work in social housing in the new, and more commercially orientated environment, that has followed the Housing Acts 1988 and 1996. It draws on the seven principles of public life adopted by the Nolan Committee.

The aim of the Code is to lay down guidelines, which will help you to maintain the values and mission of the EMB and protect you from misunderstanding or criticism.

THE PRINCIPLES OF THIS CODE

As an employee of the EMB you are expected to uphold the following principles:

- **Selflessness** – take decisions solely in terms of the values and mission of the EMB. You should not do so in order to gain financial or other material benefits for yourself, your family or friends.
- **Integrity** – do not place yourself under any financial or other obligation to outside individuals or organisations that might influence you in the performance of your duties.
- **Objectivity** – ensure that in the delivery of services, the appointment of staff or the awarding of contracts, you ensure impartiality and that choices are made on merit alone.
- **Accountability** – accept accountability for your decisions and action, to the Board of the EMB, its residents, the providers of public funds and other stakeholders, and submit yourself to whatever scrutiny is appropriate.
- **Openness** – be as open as possible about all the decisions and actions that you take. You should give reasons for your decisions and restrict information only when individual or commercial confidentiality clearly so demand.
- **Honesty** – declare any private interests relating to your duties, and take steps to resolve any conflicts arising, in a way that is lawful and protects the reputation, values and mission of the EMB.
- **Leadership** – promote and support these principles by leadership and example.

GENERAL STANDARDS

General conduct

You are expected to carry out your duties in accordance with the EMB's policies and procedures. You must dress and conduct yourself appropriately for the duty or function that you are carrying out. The Board has developed a dress code for all employees, details of which are given in Section 11 of this code

Financial conduct

You must ensure that you use funds and resources entrusted to you in a responsible and lawful manner. You should strive to ensure value for money for the EMB, its residents and any public or charitable funds.

You must be aware that it is a serious criminal and disciplinary offence corruptly to receive or give any gift, loan, fee, reward or other advantage in return for doing (or not doing) anything, or showing favour (or disfavour) to any person or organisation.

If an allegation of corrupt behaviour is made, you will need to demonstrate that any rewards you have obtained have not been corruptly obtained.

Confidential reporting

If you become aware of any deficiencies in service delivery, breach of this Code or other procedures, or other impropriety, you should report this to your manager, or to another senior officer of your employer. The EMB's policy on whistleblowing offers guidance on dealing with such issues and ensures that you can do this without any fear of recrimination or punishment.

Failure to follow Code of Conduct

You should recognise that failure to follow this Code of Conduct may damage the EMB and its work. Any breach of this code will normally be viewed as a disciplinary matter, to be dealt with under the EMB's disciplinary procedures.

RELATIONSHIPS

Board members

You are responsible to the board of the EMB through the line management structure, leading to the Chief Officer. If your work brings you into contact with Board Members, mutual respect between you and them is essential to the good running of the organisation. Close personal familiarity between you and individual board members could be prejudicial to this relationship, and should be avoided in work context.

You should not try to use informal channels to influence board members on matters of board business. If you feel that your relationship with a Board member is developing or has

developed beyond the boundaries of a professional relationship and is becoming more personal then you should seek advice from the Chief Officer or the Chair of the Board. You should not place yourself or the Board member in a situation where your actions or decisions may be misinterpreted or misconstrued.

Residents

If you are involved in the delivery of services, you should always remember your responsibilities to the residents and community you serve, and ensure courteous, efficient and impartial service delivery to all groups and individuals.

You should always give your name and job title to any resident or member of the public with whom you have contact.

You should never allow any personal relationship with a resident to conflict with the duties of your employment, or the best interests of any resident. You must never allow yourself to be compromised by, nor taken advantage of by your relationship with residents.

You must not invite or influence a resident to make a will or trust under which you are named as executor, trustee or beneficiary. If handling a resident's money, you must take extreme care, including receipting every transaction.

You may not receive loans from residents, and may not give loans from your personal money to residents.

Potential residents

If you are involved in the award of tenancies or allocation of housing, you must ensure absolute impartiality in the decisions made, and avoid any conflict of interest.

Contractors

All current or past relationships of a business or private nature with external contractors, or potential contractors, should be declared to your manager. This applies whether or not you personally are involved in the appointment or supervision of contractors.

EQUALITY AND DIVERSITY

You should ensure the EMB's policies concerning equality and diversity issues are complied with, both in the letter and the spirit. Equality and diversity issues affect every area of the EMB's work: in provision of services, purchasing decisions and as an employer. All members of the local community, residents, suppliers and your fellow employees have a right to be treated with fairness and equity.

BALANCING CONFIDENTIALITY AND OPENNESS

The law requires that certain types of information must be available to the local authority, members, auditors, residents and the public. The EMB has policies and procedures on openness and confidentiality. You need to be aware of these and if in doubt seek guidance from your manager or the Chief Officer.

Personal information about the EMB's residents, about applicants for housing, your colleagues or other individuals must be regarded as strictly confidential. Information about such individuals may only be released outside the organisation with the written consent of the individual concerned. Exceptions to this will only be made in meeting over-riding legal requirements, and you must have written permission to do so.

You should not use any information obtained in the course of your employment, for personal gain or benefit, nor should you pass it on to others who might use it in such a way (see also section on commercially sensitive information).

TENDERING AND PURCHASING

General

You must exercise fairness and impartiality when dealing with consultants, suppliers, contractors and sub-contractors. All orders and contracts must be awarded on merit, by fair competition. The EMB has policies and procedures for ensuring fair tendering and procurement processes. (See Section 10 below on declaration of interests).

No special favour should be shown to any business with which you or your family has some personal or professional connection. The same applies to any business connected with current or recent former employees or their partners, close relatives or associates.

Confidentiality of information

If you have access to confidential information on tender costs or other commercially sensitive information, then you must not disclose that information to any unauthorised person or organisation.

Use of the employer's suppliers or contractors

Where possible, and where alternatives exist, you should avoid the use of suppliers, contractors or other organisations used by the EMB.

In practical terms, this may not always be possible or practical. If you use the EMB's suppliers or contractors for personal services, you must achieve a separation between your personal purchasing decisions and the EMB's, and must not give or receive favourable treatment.

Where you do use such a company, you should make a declaration to your manager for goods or services, and obtain written consent before such use, however small the amount.

EMPLOYMENT MATTERS

In order to avoid any possible accusations of bias, you should not be involved in an appointment where you are related to an applicant, or have a close personal relationship outside work with him or her. Any such relationship should be declared to your manager, whether or not you are involved in the appointment process.

Similarly, you should not be involved in decisions relating to discipline, promotion or pay adjustments for any other employee who is a relative, partner or close personal friend.

The law and the EMB's procedures lay down rules for appointment, discipline and dismissal of staff. These must be observed scrupulously and impartially.

You must not canvass the support of colleagues or board members for any candidate applying for employment. You must also resist and report any attempt by others to do so involving you.

If you (or a member of your family) are a resident or tenant of your employer, you must not use your position as an employee to gain any advantage or preferential treatment.

OUTSIDE ACTIVITIES

General

Your activities outside the workplace are your own business, but in some circumstances could overlap with the interests of the EMB. If in any doubt, you should declare the matter to the Chief Officer, and seek any necessary written permission.

You should obtain written permission before undertaking outside activities if your official duties overlap in some way with the proposed activity, if it causes a conflict of interest, or if it makes use of material to which you have access by virtue of your position.

Paid employment

You should obtain written consent to take any outside paid employment. You should be clear about your contractual obligations, and should not take outside employment, which conflicts with the EMB's interests.

Use of office facilities

No outside work (paid or voluntary) of any sort should be undertaken in the office, and no use should be made of office facilities (such as telephones, postage or access to secretarial support). This prohibition includes receipt of correspondence and incoming telephone calls relating to outside work.

Political campaigning and public activities

You must avoid any activity in the public arena, which could bring the EMB into disrepute. Your employer will have procedures concerning political and campaigning activities, and standing for public office, and these must be followed.

You must follow the lawful expressed policies and procedures of the EMB, and must not allow your own personal or political opinions to interfere with your work or impartiality.

GIFTS AND HOSPITALITY

Gifts

You must not accept personal gifts with a significant monetary value, although inexpensive items, such as free pens, calendars, chocolates and similar items may be accepted. Gifts of cash may not be accepted under any circumstances.

Personal gifts may not be solicited under any circumstances

When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this Code.

Hospitality

You should never accept lavish hospitality, or any hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties. Nor should you offer such hospitality to others on behalf of your employer. The timing of hospitality in relation to procurement or purchasing decisions that the EMB may be taking is especially sensitive. Above all, you must never solicit hospitality.

When you have to decline a gift, you should be courteous but firm, and draw the attention of the person making the offer to the existence of this Code. If necessary, you should pay your share of any costs, and claim these from the EMB in the ordinary way.

Acceptable hospitality

You may accept modest working meals, cups of tea and other minor cases, without making any declaration or obtaining written consent.

Other hospitality may be accepted, with prior written consent, where:

- There is a genuine need to impart information or represent the social landlord in the community.
- Where an event is clearly part of the life of the community, or where the social landlord should be seen to be represented.
- The hospitality concerns attendance at relevant conferences or courses, where it is clear the hospitality is corporate rather than personal.

All such hospitality received should be recorded in the organisation's hospitality register, as should hospitality given on behalf of the EMB.

Site visits etc.

Where you have to go with a contractor or supplier to inspect sites or equipment, you should claim the cost of such visits from the EMB in the ordinary way.

Sponsorship

Where an outside organisation wishes to sponsor, or is seeking to sponsor the activity of the EMB, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning the award of contracts and acceptance of gifts or hospitality apply.

DECLARATION OF INTERESTS

General

You must ensure that your private or personal interests do not influence your decisions, and that you do not use your position to obtain personal gain of any sort, either for yourself directly, or your families, friends or associates.

You must declare any actual or potential conflicts of interest arising from previous sections of this Code, in the EMB's register of interests.

Declarations

You should be meticulous about declaring any actual or potential conflicts of interest as they arise, as affecting you, your close family, friends or associates (potential conflicts of interest are sometimes referred to as dualities of interest). You must declare to your manager any financial or non-financial interests that you consider could bring about conflict with the social landlord's interests. These could typically involve the sale or purchase of property, or the awarding of any contracts to a person or firm, but might be in other areas of your employer's work. If in any doubt, you should seek advice from your manager.

If you are the board (or committee) member of another social landlord or voluntary agency, you should declare conflicts of interest arising in the normal way. The same is true if you are an elected member of a local authority.

Conduct in meetings

If you are present at a Board or Committee Meeting, which is discussing an item that poses a conflict of interest for you, you should declare the interest. If the conflict is clear and substantial, you should leave the meeting.

PERSONAL DETAILS

All staff are required to notify the Business Services department of their private address and telephone number (if any), date of birth and next of kin, and also to notify any change(s) in these details.

Personal details and other documents relating to individual's employment will be kept on your Bright HR personal file, and are the confidential property of the EMB. Your file is available for inspection by you and/or your representatives, given reasonable notice and time, during normal office hours. Staff/union representatives may also inspect your file with your written authority.

The EMB recognises its responsibilities under the Data Protection Act 2018 (GDPR) with respect to personal details.

DRESS CODE

The EMB have directed that the staff team should have a smart corporate appearance when delivering their service. Staff working on site in void properties must wear appropriate safety clothing suitable to the task in hand and health and safety clothing supplied by the EMB.

OFFICE TIDINESS

Employees should, at all times, contribute to the cleanliness and tidiness of all equipment and working areas. Employees are responsible for their own office tidiness, in particular for tidying up after completing work for the day, and leaving the office in a clean condition, so as to help the office cleaners.

No non-EMB literature or notices of any kind may be distributed or displayed on the EMB's premises, without the express permission of the Chief Officer.