



Code of Conduct

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1. Introduction

To facilitate effective governance of Highstone Housing Association, the board has adopted this Code of Conduct as an addendum to its Governance Policy. It is based on good practice recommended by the National Housing Federation and measured through the Code of Compliance adopted by HHA. The main principles of the code are:

- A. Probity
- B. Loyalty and conflicts of interest
- C. Remuneration
- D. Personal Benefit
- E. Prevention of bribery and corruption
- F. Respect

2. Probity

HHA board will ensure that appropriate policies and procedures are developed, implemented complied with and reviewed to ensure that statutory and regulatory requirements are reflected. All policies and procedures will be communicated to all board members, staff, involved residents and contractors, initially through the induction process and then through ongoing training and meetings process. All policies and associated procedures are published on the HHA website. The residents welcome pack includes a copy of the resident's handbook, full tenancy agreement and an easy read version. The board commits to incorporate the following policies and procedures:

1. conduct of board members, staff, involved residents and contractors	10. remuneration and expenses
2. declarations of interest	11. bullying and harassment
3. openness and transparency	12. meeting conduct
4. bribery and corruption inc. gifts and hospitality	13. use of HHA funds and resources
5. payments and benefits	14. health, safety and security
6. fraud	15. alcohol, illegal drugs and substance abuse
7. procurements of goods and services	16. complaints and feedback
8. equality and diversity	17. confidential reporting (whistle-blowing)
9. data protection	

3. Loyalty and conflicts of interest

Board members agree to abide by the Conflict of Interest policy at appendix 1.

4. Remuneration

Remuneration decisions will be lawful, transparent, fair and proportionate.

HHA Board members do not receive remuneration for their services. Should this need to change in the future, then the board will commission a policy paper to facilitate the decision-making process.

Executive Directors will be paid in accordance with its articles of association. All staff are paid in accordance with their contracted terms and conditions.

5. Personal Benefit

HHA must demonstrate that board members, staff, involved residents and those with whom they are closely connected, receive no preferential consideration in the provision of benefits such as housing accommodation or employment:

- HHA is not responsible for the appointment of tenants into its accommodation, such decisions rest solely with the individual local authority commissioner's team.

- All employment decisions comply with Highstone’s fair and transparent HR policies relating to the employment and the provision of social and welfare benefits.

6. Prevention of bribery and corruption

HHA will keep a register of hospitality and gifts, which will be available for inspection by persons with a legitimate interest in the affairs of HHA. All gifts and/or hospitality offered (whether accepted or not) will be recorded in the register, except modest working lunches provided by or to a third party.

The register will record the following:

Date	Name of recipient	Name of organisation/individual providing/receiving gift/hospitality	Description incl. known/estimated value	Gift declined/returned; accepted and donated; accepted and retained	Details of charity to which accepted gift was donated	Name of authorising officer

HHA board has agreed that:

1. HHA does not permit the giving or acceptance of lavish hospitality or expensive gifts
2. Modest, appropriate and proportionate gifts may occasionally be offered to external organisations and their officials
3. Staff and board members are only permitted to accept and keep token gifts of very low value, such as pens, diaries and small promotional items.
4. All corporate hospitality offered by third parties should be declined unless there are good business reasons to accept. A specific exemption is made in relation to refreshments and modest lunches taken during a business meeting. In all other circumstances, acceptance of hospitality should always require prior approval at an appropriate level.
5. Where hospitality is accepted it should be ethically, morally, socially and politically acceptable. Nothing will be accepted that brings HHA or the sector into disrepute.
6. Permission to attend sporting events, shows, concerts or similar events paid for by third parties will not normally be granted. A specific exemption is likely to be made in relation to attendance at an award event relevant to the association’s business.
7. Staff and board members are not permitted to receive from external third parties any paid travel, accommodation or general subsistence, except for reasonably priced travel and accommodation in connection with activities, such as speaking at a conference.
8. Staff and board members must report to the company secretary any attempt to undermine impartiality by the offer of substantial gifts or other inducements.

If in doubt, staff and board members should seek advice from the company secretary.

7. Respect

Highstone Housing Association Board will adopt and promote standards to ensure the conduct of board members, staff and involved residents at meetings, events, and in the workplace, demonstrates respect for all, and promotes the values of Highstone. The governance policy outlines the standards of conduct, attendance and preparation expected of board members in their capacity as executive and non-executive directors. Further policies which support workplace behaviour include: financial viability, confidential reporting, customer service charter, anti-social behaviour, equality and diversity, health and safety, data protection and induction processes.

8. Conclusion

The board is committed to upholding the principles of the code of Conduct 2012 produced by the National Housing Federation.