



Queens
Cross
Housing
Association

Code of Conduct

July 2020

qcha.org.uk

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Our Vision, Values & Strategic Objectives

Our Vision Excellent housing in vibrant communities.

Our Values

Respect

We see the positive in everyone, especially our tenants. We treat everyone fairly, regardless of age, race, gender, sexuality or background. We ask for opinions even if we know we might not like what we hear. And we address people's concerns in any way we realistically can.

Integrity

What we say in public is the same as what we say behind the scenes. If we say we'll do something we mean it. Our tenants can count on us to solve their problems and make sound decisions.

Aspiration

We want the best for all our current and future tenants. We're not afraid to strive for things that won't be easy - or try things that haven't been done before. We seek out opportunities and welcome change. If it doesn't turn out as planned we learn and improve.

And then we try again.

Our Strategic Objectives – what we will do

- Build more desirable homes in popular neighbourhoods.
- Deliver more excellent services to suit our tenants' lives.
- Invest in our people to grow and develop their skills.
- Find more ways to ensure value for money.
- Continue to challenge poverty
- Put even more focus on community health and wellbeing.
- Be ready for opportunities

Our commitments

Equality, Diversity & Inclusion

The Association's Equality, Diversity & Inclusion Strategy 2018-21 sets out our aim to break down barriers to communication and participation, eliminate discrimination and give equal opportunities and access to services to all groups, communities and individuals. The strategy outlines five objectives that includes placing equality and diversity in our mainstream day to day activity.

We promote equality, diversity and inclusion in all our employee policies and procedures to ensure that all employees are treated equally and that they are treated fairly on in relation to the protected characteristics as outlined in the Equality Act 2010.

To help monitor the impact of equality, diversity and inclusion on our policies and procedures, we completed an Equality Impact Assessment (found at the end of this document).

Positive about disabled people

Building on our commitment to equality, diversity and inclusion we take positive steps to provide an environment where people with a disability can maximise their potential and have equality of opportunity in recruitment, training and promotion. We will ensure any reasonable adjustments are made to support employees with a disability throughout our employment policies and procedures.

LGBTi

We understand that people perform better when they can be themselves. Therefore, we are committed to making the Association an environment where lesbian, gay, bi, trans and intersex people (LGBTi) can be themselves. To support colleagues and to create an inclusive environment, we are a Stonewall Diversity Champion. Working with Stonewall Scotland, we ensure our policies, procedures and staff benefits align with best practice for sexual orientation, gender identity, equality, diversity and inclusion.

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Policy & Procedure Review

All corporate employment policies and procedures are reviewed every 3 years in line with best practice and current legislation. We consult with the recognised Union for all corporate employment policies.

The Association reserves the right to make additions or alterations to this policy and procedure from time to time and employees will be notified of any such additions or alterations. Any timescales set out in this policy may be extended where required.

Data Protection Statement

As your employer we will collect and process personal data relating to you to manage our contract with you. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations with you. Further information about this commitment can be found within our Worker (employee) Privacy Notice

1. Introduction

- 1.1 The Association expects a high standard of conduct from all our employees and the purpose of this code is to ensure that you act with the highest standards of integrity. The code sets out the minimum standard expected of you.
- 1.2 This code of conduct should be read in conjunction with the Association's policies and procedures, including but not limited to; the Terms and Conditions of Employment, Dignity at Work Policy, and Whistleblowing Policy, all of which are available on the Intranet (Source).
- 1.3 As a Registered Social Landlord (RSL), we are required to adopt and comply with an appropriate Code of Conduct. This Code is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations and Employers in Voluntary Housing – Supporting Social Employers (EVH). The Scottish Housing Regulator (SHR) has confirmed that this Code fully complies with its Regulatory Standards and their input during the production of this code is acknowledged.
- 1.4 You should note that the code does not affect your rights and responsibilities under the law; its purpose is to provide clear and helpful advice. Equally importantly, the code provides you with information about your rights and duties. As an employee you have the right to be treated fairly, with respect and not to be discriminated against. The Association is committed to providing a work environment that ensures all employees are treated with dignity and respect.
- 1.5 It is your responsibility to monitor your own behaviour against the standards set. Should you be unclear on how to act on any occasion you should discuss this with your Line Manager or a member of the HR team.
- 1.6 You must make yourself familiar with the terms of this Code and act in accordance with its requirements at all times. You are required to 'sign' the Code to confirm that you have read and understood the terms of the Code and you have a personal responsibility to uphold the requirements of this Code. This will be an electronic signature via a mandatory read on Source.
- 1.7 If there are any aspects of this Code, or of any of the related policies, on which you are unclear, you must seek guidance from your manager. Your manager, or a member of the HR team, will also be able to give guidance where you are unsure how the Code or related policies apply in a particular situation.
- 1.8 The Code is not exhaustive and it should be remembered that all employees of RSLs are responsible for ensuring that their conduct at all times meets the high standards that the RSL sector is recognised for upholding. As well as observing the detail of the Code, you should apply its intention and spirit to all situations in employment.

2. Principles & scope

- 2.1 This policy applies to all employees, sessional workers and agency workers working for the Association. The following principles underpin the Association's Code of Conduct Policy:
 - 2.1.1 **Selflessness, Objectivity and Leadership:** You must act in the best interests of the Association at all times within the framework set by the organisation, working to promote our aims and objectives, upholding our values and setting a good example by your own conduct.

Selflessness - you should take decisions solely on the basis of the values and objectives of the Association. You should not do so in order to gain financial or other material benefit for yourself, your family or friends.

Objectivity - you should ensure that in the delivery of services, the selection of staff and awarding of contracts, you maintain impartiality and base decisions on merit alone.

Leadership - you must support and promote these principles and lead by example.

2.1.2 **Openness and Accountability:** You must declare all relevant personal interests. You must handle information in accordance with our policies and procedures. You must report to the appropriate senior person within the Association any reasonable and honest suspicions you may have about possible wrongdoing.

Openness - you should 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 demands.

Accountability -you must accept accountability for your decisions and actions and submit yourself to whatever scrutiny is appropriate internally and/or by external bodies and stakeholders.

2.1.3 **Honesty and Integrity:** You must act at all times with honesty and integrity. You must not use, or seek to use, your position to gain financial or other benefit for yourself, your family or friends.

Integrity - you should avoid having any (financial or other) obligations to outside individuals or organisations that might influence you in relation to the Association.

Honesty -you must declare any private interest relating to your duties, and take steps to resolve any conflicts arising in a way that is lawful and protects the reputation, vision and values of the Association

3. Registered services

3.1 We have responsibilities, as an employer of employee working within a registered service, which are set out in the Code of Practice for Employers of Social Service Workers (the Code for Employers) and the Regulation of Care (Scotland) Act 2001 (the Act).

3.2 We are legally obliged to notify relevant regulatory agencies, such as the Care Inspectorate and the Scottish Social Services Council of certain disciplinary procedures that may arise due to employee misconduct. Employees working within a registered service must adhere to the relevant codes of practice aligned to their service, as well as this code of conduct.

4. Conflicts of interest

4.1 It is expected that employees treat each other with mutual respect. Close personal familiarity could be prejudicial to the good running of the Association and should be avoided. You should not use informal channels to influence the business of the Association. You must not use, or seek to use, your position to promote your personal interests or those of any person with whom you are closely connected or the interests of any business or other organisation with which you have a connection.

4.2 You must not allow any private interest to influence your decisions. You must not use your position to influence the granting of a tenancy / employment / contract or any other benefit from the Association. You, or someone closely connected to you, cannot as a result of your role with us receive preferential treatment relating to any services provided by the organisation or its contractors/suppliers, and you should be able to demonstrate this.

4.3 You may have a private interest which relates to the work of the Association. This may be a financial interest or one which might reasonably be considered to influence your judgement. All such interests must be declared using the EBP Update Form on Source (further information regarding what needs to be declared can be found in Appendix 1). If your circumstances change at any point during your contract of employment you must update this form.

4.4 Employees who find that their friendship or close relationship may cast doubt on the objectivity of their decision-making should advise their line manager. This is to prevent them leaving themselves open to allegations of bias or favouritism. Further information about relationships at work can be found in Appendix 2.

- 4.5 It is recognised that the use of contractors / consultants / partnering organisations linked to the Association may be perceived as a conflict of interest. You are not permitted to utilise the services of any contractors / consultants / partnering organisations outwith your employment with the Association. Any breach of this policy may give rise to action in terms of the Association's Disciplinary Policy and Procedure.
- 4.6 We must ensure that no conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise. You must declare, and manage openly and appropriately, any actual or potential interests or conflicts.
- ## 5. Gifts & Hospitality
- 5.1 Employees must never place themselves under any obligation to third parties, which might influence, or be perceived to influence, the carrying out of their duties. All offers of gifts or hospitality received by employees should be treated with caution. All **significant** offers of gifts and hospitality must be refused.
- 5.2 You must not accept any offers of gifts or hospitality from individuals or organisations which might reasonably create – or be capable of creating – an impression of impropriety, influence or place you under an obligation to these individuals or organisations. You must comply with our policy on the matter.
- 5.3 For guidance, significant gifts and hospitality include, but are not restricted to the following:
- Money
 - Free goods
 - Free services
 - Provision of a holiday or weekend away
 - Free accommodation and travel
 - Free meals (not relating to specific work related events)
 - Any form of hospitality which could reasonably be perceived as lavish or excessive
 - Any offer of hospitality made by a party with whom the Association is in dispute, even if in normal circumstances the offer might be considered not to be significant
- 5.4 Notwithstanding the above, gifts or hospitality of a minor value are classed as non-significant and may be accepted. Examples of non-significant gifts and hospitality would include, but are not restricted to the following:
- Small gifts of a promotional or advertising character, which are often given to a wide range of people, e.g. calendars, diaries, pens, charts and other similar articles.
 - Small gifts made to a number of people on the same occasion or as part of a normally accepted practice, e.g. small gifts given by another Housing Association to celebrate their anniversary.
 - Small gifts offered on an unsolicited basis by a contractor, customer or other party, e.g. a box of chocolates, etc.
 - Attendance in an official capacity to functions to which invitations have also been sent to representatives of other organisations.
- 5.5 Gifts should not be accepted on a regular basis from an individual customer. You may accept a one-off gift. However, where there appears to be a pattern of gifts being offered you must decline the request and highlight the pattern to your line manager. Consideration needs to be taken in relation to vulnerable customers in how this matter is dealt with (further advice should be sought from your line manager).
- 5.6 It would normally be expected that the value of non-significant gifts / hospitality would not exceed £50. Money is never acceptable. Non-significant perishable gifts (i.e. chocolates / biscuits) should be opened and shared amongst the staff within a department / work location.
- 5.7 All offers of gifts and hospitality must be recorded in the Association's register, whether accepted or refused. Employees must complete the Receipt of Offers of Gifts & Hospitality

Form (on Source) and return to the Executive Office. Any gifts of alcohol should be passed to the Executive Office.

- 5.7 The Association may also at times request donations / gifts from third parties at certain times, e.g. gala day. These will only be used for the purpose for which they were requested, e.g. prize at raffle. The Housing (Scotland) Act 2001 places limits on our ability to make gifts to employees. The Executive Office must also be notified when any gifts are granted to an employee using the Association Gift & Hospitality Form.

6. Financial conduct

- 6.1 You must ensure that you:

- Use funds and resources for the purpose intended, and in a responsible and lawful manner
- Safeguard them from abuse, theft or waste
- Strive for value for money
- Apply and observe Association's financial regulations and internal controls
- Familiarise yourself with Association's financial policies and procedures.

- 6.2 Theft / fraud - We strive to meet the highest ethical standards. We recognise that, like any other business, there are risks of financial and organisational loss due to fraud. This may damage the service we provide and our reputation with customers, public and the regulators. The Association has a responsibility to protect its assets, reputation and the public funds it receives. The Association is fully committed to the prevention, detection and reporting of fraud, theft and corruption; and the recovery of assets. You are obliged to report any instances of suspected theft or fraud. For more details see the Whistleblowing Policy.

- 6.3 Bribery – The Association forbids all forms of bribery, meaning a financial or other advantage intended to persuade someone to perform improperly any function or activity. You are not allowed to accept or give bribes from/to anyone with whom the Association does business. You are also obliged to report any instances of suspected bribery within either the Association or any of its business partners. Accepting or giving bribes is gross misconduct and will result in disciplinary action up to and including dismissal. Such action may also result in criminal prosecution and imprisonment of up to 10 years for individuals found guilty of such acts.

- 6.4 Tendering and Purchasing – All orders and contracts must be awarded on merit and by fair competition. You must not disclose confidential information on the tender process and you must adhere to the Association's Procurement Policy and Procedure. No employee will have any involvement in a tendering or purchasing process, in which they (or a close relative) are directly connected to an organisation with which may enter into a business relationship with the Association.

7. Property, information and Data Protection

- 7.1 All property belonging to the Association can only be used for business purposes unless explicit consent is given. This includes physical property, the business premises and intellectual property. You must not undertake work for another organisation - or for any personal business - on the Association's premises nor use our resources or facilities for such a purpose, unless you have specific permission from your line manager.

- 7.2 All property of the Association that you use or are responsible for must be used carefully and must be protected and stored in a safe place when not in use. It must also be only used for the Association's benefit and in the way that it is intended. It should not be used for the benefit of individual employees unless explicit consent has been sought and given by the appropriate manager.

- 7.3 Any confidential documents should be securely locked away when left unattended and properly disposed of when necessary in accordance with the Association's relevant policies, legislation and best practice.

- 7.4 When handling information, there should be a balance between **openness and confidentiality**. It is a requirement that certain information is available to members, auditors, the Regulator(s), etc. You should be aware of these requirements and act accordingly.
- 7.4.1 As a publicly funded body, we are required to be open and transparent and should only withhold information when there are justifiable reasons for doing so, for example matters that are personally or commercially sensitive. This means that general documentation such as Board minutes, Association policies and approved annual accounts should be made available to the general public upon request.
- 7.4.2 Employees need to be equally aware of the types of information that must be kept confidential. Personal information about our tenants, applicants for housing, colleagues or any other individuals must be regarded as strictly confidential. Information about such individuals must only be released outside the organisation with the prior written consent of the individual concerned and then only by appropriate staff members.
- 7.4.3 All data records, both paper and computer, relating to individuals will be kept confidential to appropriate employees. Such details must not be divulged to employees who do not require to know it in the course of their employment. Board Members are not permitted to view individual data records of tenants or employees.
- 7.4.4 It is important that you ensure that confidential information acquired through your role as an employee, is not disclosed to anyone other than those having a right to the information. It is equally important to ensure that confidential information acquired through your role is not used for personal advantage.
- 7.4.5 If you are unsure at any time whether particular information should be made available on any occasion, you should consult your line manager prior to providing the information.
- 7.4.6 You must ensure that you are aware of the Association's policies and procedures in relation to data protection, collection and handling.
- 7.5 You are provided with access to and the use of the Associations ICT services. You must use these services in line with the relevant ICT and data protection policies and procedures.
- 7.6 The **Data Protection Act (2018)** protects personal information about individuals, governing how this information can be processed and the rights of an individual to access their personal information. If you are handling information that comes under the aegis of the Act, you need to be sure that you are handling it appropriately and understand what to do if someone makes a request to access their own, or someone else's, personal information.
- 7.6.1 You must:
- Process personal data fairly and lawfully
 - Only obtain and process personal information for the purpose that you originally specific
 - Only collect and store the amount of information you need to carry out your task
 - Ensure that data you keep is accurate and kept up-to-date
 - Process data in accordance with the rights of data subjects as outlined in the Data Protection Act
 - Make sure that appropriate technical measures are taken to protect personal data and that it is not accidentally damaged or destroyed
- 7.6.2 You must not:
- Do anything that breaches any of the principles of Data Protection
 - Transfer personal data outside of the EEA, unless the destination country ensures adequate protection
 - Keep personal information for any longer than you need it

8. General matters of conduct

- 8.1 High standards of personal conduct are expected of employees. You should show courtesy, efficiency, reliability, sobriety and punctuality, and you must treat others with respect at all times. This includes considering the views of others and being tolerant of differences. You must avoid any situation that could give rise to suspicion or suggest improper conduct.
- 8.1.1 **Policies:** You are expected to carry out your duties in accordance with all of the Association's policies and procedures. In presenting information you must set out the facts and relevant issues truthfully.
- 8.1.2 **Behaviour and competency:**
- You must not, by your actions or behaviour, cause distress, alarm or offence. You must not harass, bully or attempt to intimidate any person.
 - You must take direction from your line manager, other senior managers and the governing body, and exercise responsibly any authority that comes with your role as an employee.
 - When attending meetings, you must be courteous to all attendees and respect the position of the meeting chair or convenor. You must also ensure that mobile phones are switched off/on silent other than in very exceptional circumstances where it is necessary to take an urgent call.
 - You must participate in any necessary training, and play an active part in our performance appraisal process. You will contribute to the identification of any personal training needs you may have in order to keep your professional skills and knowledge up to date.
 - You must not seek to use informal channels to influence the governing body regarding decisions to be made about the conduct of our business.
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- 8.1.3 **Facilities:** You must take care when displaying materials in the office, and ensure that these would not reasonably cause offence to your colleagues. If in doubt, consult your line manager before displaying any materials. You may not use official premises for unofficial purposes at any time without the prior approval of the appropriate Director.
- 8.1.4 **Equality & Inclusion:** You should always be courteous and helpful. You should deal fairly, equitably and consistently with each member of the public / staff / stakeholders and you must follow our Equality and Diversity commitments. You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests. This also applies when you are representing the organisation out-with the Association's premises.
- 8.1.5 **Recruitment:**
- Staff involved in making appointments should ensure that these are based on merit alone. Personal preferences should not influence judgments to be made. Further information can be found in the Association's recruitment and selection policy.
 - No employee will participate in a selection process where the candidate is a relative or close personal friend.
 - Employment law and the Association's current recruitment and selection procedures must be thoroughly observed and be impartial. All recruitment and selection procedures and decisions must also comply with the Association's Equality and Diversity commitments.
- 8.1.6 **Misuse of drugs and alcohol:** It is gross misconduct offence to be on the Association's premises and/or carrying out your duties when under the influence of alcoholic drink or non-medically prescribed drugs. See the Alcohol and Drugs Policy (within the Health & Wellbeing Policies) for more information.
- 8.1.7 **Gambling:** Gambling activities should not be conducted on the Association's premises. However discretion may be used in relation to raffles, national lottery syndicates, occasional sweepstakes etc where the amount gambled is relatively low.

- 8.1.8 **Contacts with media:** Media inquiries should be passed to the communication team who will draft relevant responses to general queries. You are not allowed to publish any material or deliver any lecture or address issues relating specifically to the Association or its business without prior approval. You should discuss any such requests with your line manager.
- 8.1.9 **Confidential Reporting (Whistleblowing) and Complaints:** The Association recognises that employees will very often be the first to see or suspect misconduct or wrongdoing. We wish to encourage all our employees to keep their eyes open and to raise concerns in an appropriate manner to demonstrate and ensure good practice in all our activities. To that end, we have a Whistleblowing Policy that details how concerns can be raised. The Whistleblowing Policy is only applicable to employees. Any service user who is unhappy with any aspect of the Association's service should be referred to the Association's Complaints Policy.
- 8.1.10 **Political, campaigning and public activities:** It is crucial that employees carry out their work without any bias towards any political or other group. You must follow the expressed policies and procedures of the Association as their employers, and must not allow their own personal or political opinions to intervene with your work or impartiality. None of the above impinges on an employee's rights to be an active citizen or, for example, an active trade unionist or acting in such capacity.

9. Upholding our reputation

- 9.1 You must not act in a way that could reasonably be regarded as bringing us into disrepute. This would include publicly making any derogatory comments about the Association, its employees, governing body members, service users, customers, stakeholders and anyone that we are doing business with.
- 9.2 If you have a grievance or concern relating to an employee or of the governing body or have any concern about potential wrongdoing you should discuss it with your line manager or with a member of the HR team.
- 9.3 You must always be a positive ambassador for us and our work, especially when attending events as a member of our staff or in dealing with outside bodies.

10. Working with tenants and service users

- 10.1 The Association works with and supports a range of tenants, service users and vulnerable groups. You must maintain high standards of professionalism, fairness and courtesy in all your dealings with tenants and other service users.
- 10.2 As a general rule, in relation to tenants and service users you must not:
- Give or loan them money
 - Receive a gift or loan of money from them
 - Invite or influence them to make a will or trust under which you are named as executor, trustee or beneficiary.
- 10.3 In circumstances where you have a declared family connection to a tenant/service user, common sense will be applied and the organisation would not seek to impose restrictions on the private exchange of money between you and that individual.
- 10.4 You must not allow any personal relationship with a tenant or other service user to conflict with the conduct of your role and responsibilities.
- 10.5 You must use the appropriate channels for handling tenancy and service provision issues. You must not act outside our established procedures in any matter concerning any tenant or other service user.

11. Health & Safety

- 11.1 The Association will act positively to minimise the incidence of all workplace risks as required by the Health and Safety at Work Act 1974 and other associated legislation. All activities should be carried out with the highest regard for the health and safety of all staff. Our aim is excellence in health and safety, by means of continuous improvement of standards, and comprehensive use of risk assessments so as to systematically remove the causes of accidents/incidents and ill-health. This, together with more specific aims and objectives, demonstrates the Association's commitment to be a health promoting organisation
- 11.2 You must adhere to the safety rules set by the Association, details on which can be found within the Association health and safety manual. Further safety rules for specific job roles can be found within role based risk assessments. Failure to adhere to Association safety rules is considered gross misconduct under the Association's disciplinary policy and procedure.

12. Conduct / activities outside work

- 12.1 The Association does not seek to dictate how employees conduct themselves in their personal lives. However, unlawful or other conduct by employees which may jeopardise the Association's reputation or position will be dealt with under the Association's disciplinary policy and procedure.
- 12.2 There are occasions where an employee's outside activities can affect their work, or other interests of the Association. However in all circumstances, no paid or outside work should be undertaken at your place of work or require the use of office facilities. This applies to any voluntary or unpaid work. Employees should inform their line manager of any possible conflict and seek necessary written permission to continue with the activity. If the outside activities will overlap with your work with the Association, do not commence until written permission has been granted.
- 12.3 Employees may not accept a post or undertake any occupation or activity which would require their attendance at any time during office hours and/or prejudice the proper performance of their duties for the Association., Permission may be granted by the employee's line manager for such activities. This permission should therefore be sought in advance. Where the employee is in doubt as to whether this condition would apply, they should err on the side of caution and speak with their line manager.
- 12.4 Social Networking – information posted on such sites is classed as public not private information. You are therefore not allowed to disclosure confidential information relating to the Association and the work that we do. It is also prohibited to post any comments that may potentially bring the Association into disrepute. Any such actions could result in disciplinary action as per the Association's disciplinary policy and procedure. Further information can found in the Association Social Media policy.

13. Breaches of the Policy

- 13.1 You have a responsibility to promote and uphold the requirements of this Code. If you consider that you may have breached the Code, or have witnessed or become aware of a potential breach by another staff member, you should immediately bring the matter to the attention of your manager or a member of the HR team.
- 13.2 You have a duty to co-operate with and contribute to any investigation relating to a potential breach of the Code or an associated matter
- 13.3 Any breach of this Policy may give rise to action in terms of the Association's Disciplinary Policy and Procedure, and may result in a disciplinary action being taken, which may include dismissal.

Introduction

Being a member of Queens Cross Housing Association's staff is of course only one part of your life. Other aspects of your life - such as family, friends and neighbours, voluntary work, causes you support, possibly business or financial interests, possibly your own housing arrangements - may have the potential to cross over into your role as a staff member.

However, as we are an organisation that works for the community [and uses public funds], it is essential that there is no conflict - and that there can be no reasonable perception of conflict - between your duties as a member of staff and your personal (or personal business or financial) interests.

Any potential conflict between your position as a member of our staff and your other interests must be openly declared and effectively managed so as to protect the good reputation of the Association and the RSL sector.

As stated in the Code, where you have a personal business or financial interest in any matter that is relevant to our activities or is being considered (or is likely to be considered) or you know that someone to whom you are closely connected has such an interest, you must declare it promptly and record it in the Register of Interests.

This Appendix gives further guidance on how to declare and manage any personal (including personal business or financial) interests.

Examples of interests that must be declared

The following are examples of the kind of interest that you must declare. Please note that this list is not exhaustive, and there may be other interests that you should also declare.

- Tenancy of a property (by you or someone to whom you are closely connected) of which we are the landlord.
- Occupancy or ownership of a property (by you or someone to whom you are closely connected) which is factored or receives property related services from us.
- Receipt of care or support services from us.
- Membership of a community or other voluntary organisation that is active in the area(s) we serve.
- Voluntary work with another RSL or with an organisation that does, or is likely to do, business with us.
- Membership of the governing body of another RSL.
- Being an elected member of any local authority where we are active.
- If you purchase goods or services from us.
- If you purchase goods or services from one of our approved contractors or Framework Agreement partners.
- Significant shareholding in a company that we do business with.
- Membership of a political, campaigning or other body whose interests and/or activities may affect our work or activities.
- Ownership of land or property in our areas of operation excluding for the purpose of your own residential use (i.e. there is no requirement for you to declare any house in which you currently live).
- Unresolved dispute relating to the provision of services in connection with a tenancy or occupancy agreement or a contractual dispute over the provision of goods or services with us.

If you are not sure whether a certain matter needs to be declared, you must seek guidance from your manager or from a member of the HR team. If doubt remains, the advice would always be to declare the matter.

You should note that in some circumstances, declaration of an interest may not be sufficient, and that it may be necessary for the organisation to take additional measures to deal satisfactorily with the situation so as to protect the probity and reputations of both yourself and the organisation.

Definition of 'close connection'

Someone 'closely connected' to you includes family members and persons who might reasonably be regarded as similar to family members even where there is no relationship by birth or in law. The following table outlines those who you should consider when declaring interests:

Table A

Group 1 Members of your household	Group 2 People closely associated with you	Group 3 Others you need to consider
Anyone who normally lives as part of your household, whether they are related to you or not, including spouses/partners who work away from home and sons and daughters who are studying away from home	Parents, parents-in-law and their partners / Sons and daughters; stepsons and step-daughters and their partners / Brothers and sisters and their partners / A partner's parent, child, brother or sister / Grandparents, grandchildren and their partners / Someone who is dependent on you or whom you are dependent on / Close friends	Other relatives (e.g. uncles, aunts, nephews & their partners) Other friends (e.g. someone you are acquainted with socially, neighbours, business contacts/associates)

If you become aware of any action or involvement relating to **anyone** in the table then you should declare and manage this as soon as possible. However, we recognise that you will not always be closely acquainted with or in regular contact with all of the people listed and we do not expect you to go to unreasonable lengths to identify actions or involvement that are covered by this policy.

Please note, we do expect you to be familiar with the actions of members of your household (Group 1) and of any other people listed in the table above with whom you are closely associated and/or in regular contact and you must take steps to identify, declare and manage these.

You are not expected to be aware of the actions of people in groups 2 and 3 that you do not have a close association and/or regular contact with. We do not expect you to research into the employment, business interests and other activities of all persons with whom you are closely connected.

In relation to 3.3 – 3.6 above, when considering your actions you should do so from the point of view of a reasonable and objective observer.

Declaring personal interests

As stated in the Code, you must keep your entry in the Register of Interests up to date, add any new interests as soon as they arise, and amend existing interests as soon as any change takes effect.

A situation may arise where you are invited to be present at a meeting where a matter in which you have a personal (or a personal business or financial) interest is discussed. In such cases you must inform the meeting chair at the start of the meeting, or as soon as you become aware that this is the case. You would then be required to leave the meeting for the duration of the particular item. If in any doubt, you should ask the meeting chair or another senior person present for guidance. This applies to all meetings that you attend as a member of our staff – both internal and external.

Any failure to make a complete, accurate and prompt declaration - whether deliberately or through taking insufficient care - will be regarded as a breach of this Code.

Introduction

We recognise that employees may form friendships and sometimes personal relationships with colleagues or those connected with their work. While we do not wish to interfere with these relationships, we are duty bound to ensure that all employees behave appropriately, adhere to our standards of conduct set out in our policies and, avoid behaviours which could lead to allegations of impropriety.

This guidance note sets out expected standards regarding personal relationships connected to work. We ask that you speak to your line manager if you are unsure of the standards expected of you. If the expected standards set out below are not met, we will manage any breaches in line with our disciplinary policy and procedure.

We expect you will:

- not allow any close personal relationships with a colleague, contractor, client, customer or supplier to influence your conduct, judgement or decisions while at work.
- declare a close personal relationship with a colleague or any other person connected to your employment to your line manager. If the relationship is between a manager/supervisor, we expect this to be declared to a Director or member of the HR team.
- respect your surroundings, your colleagues and our organisation.
- not behave inappropriately during working hours, nor outwith working hours with any matters connected or associated with your employment
- be aware of your behaviour in any social media interaction connected to personal relationships at work
- follow the highest standards of behaviour at conferences and all other internal or external events where you are there in connection with the Association

Managing in-work relationships

Where employees are in a relationship and work within the same team / department, we may move one or both employees to another job in another department/section/team or, consider other working arrangements in line with the needs of the Association. In these circumstances, the organisation will discuss options with both employees and seek to reach an agreement regarding the transfer of one or both employees. If appropriate measures or working arrangements cannot be put in place, the organisation may terminate the employment of one or both as a last resort.

We will apply similar principles to an employee who is in a close personal relationship with a client, customer, contractor or supplier, in particular where the employee's job has the authority or a close connection with the individual.

If termination of employment is the last and final consideration available after other avenues have been explored, a process will be followed in line with the Association's disciplinary policy and procedure.