Hornsey Housing Trust

Code of Conduct

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Introduction

It is vital that everyone who works for, or represents, Hornsey Housing Trust (HHT) is held to the highest standards of conduct. This protects tenants, Hornsey Housing Trust, and the reputation of social housing.

Hornsey Housing Trust has adopted the National Housing Federation Code of Conduct as its Code of Conduct. It sets out the standards of behaviour expected of staff, Board members and involved tenants at HHT.

What is the Code of Conduct?

The Code of Conduct sets out the behaviours, or standards of conduct, that are expected of people who are involved in the work or decision-making of Hornsey Housing Trust.

The code does not set standards for housing associations themselves, or for how groups of people act. For example, it is not the role of this code to set out how HHT should make decisions, but it does explain how individual people involved in making those decisions should behave.

The code does not prevent anyone from exercising their rights, and in fact encourages them to do so (as set out in section H). This includes the right of tenants to make complaints and the right of all involved to use the housing association's whistleblowing procedure.

How does it fit with other policies and procedures?

The code is intended to form part of the wider suite of policies and procedures which HHT has in place, setting out how things happen within the organisation. It also sits alongside regulatory and legal expectations.

The code is written on the assumption that those using it will comply with all legal and regulatory requirements relevant to this code and with all of HHT's policies, procedures and employment contracts *.

Users of this code must have access to all relevant policies and procedures, for example, in a staff or governance manual, and for involved tenants via an online portal or as a physical copy. Housing associations may wish to provide links to these in this code for ease of access; they must also be covered in the induction of new colleagues.

* The code is a non-contractual Code of Conduct which sets out expected standards of behaviour for those within its scope. It may be taken into account when considering conduct, capability, governance or disciplinary issues, but it does not form part of an individual's contract of employment unless expressly incorporated by the adopting housing association.

Who does the code apply to?

This Code applies to all HHT staff involved in providing landlord services, including permanent and temporary staff. It also applies to Board members and involved tenants where specified in the Code. Board members

The Code of Conduct sits alongside the NHF Code of Governance and sets out the standards of conduct required of board members. This also includes any independent members of committees.

Involved tenants

The code is intended to apply to tenants who have a formal role in the HHT's governance, scrutiny or decision-making arrangements, such as tenant engagement group members or tenant committee members.. Other tenant groups may choose to adopt this code - or aspects of it - adapt it for their own purposes or operate under their own code of conduct.

Staff

The code is designed to address the standards of behaviour that should be expected from every member of staff. It sets out expectations for staff conduct in fulfilling their roles. This includes how individuals should behave towards tenants. HHT will consult with its tenants on the development, scrutiny and review of the code as a whole and on the expectations of staff.

Where landlord services are delivered on HHT's behalf by a service provider, HHT will take appropriate steps to ensure that relevant staff delivering those services have the skills, knowledge and experience, and demonstrate the behaviours, needed to provide good-quality landlord services.

Responsibilities of housing association boards

The board of each housing association is ultimately responsible for the actions, policies and work of the organisation. It is the board's responsibility to make sure that all those concerned can comply with this code.

The boards and senior staff of housing associations have a responsibility to set an appropriate framework of policies, delegations and procedures. They must promote an organisational culture founded on openness, respect and accountability to tenants, and which enables and supports all individuals to meet their responsibilities under this code.

Arrangements must be in place to enable people to ask for further information or guidance they may need about the application or detail of this code, including what should happen where there has been a failure to comply.

How the code is structured

There are five parts to the code:

1. **Acting in the best interests of tenants and the housing association.**

You have a responsibility to carry out your role in a way that supports the interests of current and future tenants and in line with the purposes and values of the housing association.

2. **Behaving with integrity**

By integrity, we mean that you must act honestly, transparently and in line with the highest standards of ethical conduct. The reputation and good name of the housing association depends on compliance with this code, and with the laws, policies and procedures that it refers to.

3. **Treating others fairly, with respect and empathy**

The way in which people behave towards each other is fundamentally important to the experience of tenants and staff of the housing association. Respectful, fair and empathetic behaviour is essential to building trust, maintaining effective relationships and supporting a healthy organisational culture.

4. **Taking responsibility for the impact of your actions**

You have a responsibility while on the housing association's business to consider the immediate and longer-term impact of your actions and to be accountable for them.

5. **Acting with diligence and care**

The diligence and care with which roles are performed has a significant impact upon the quality of decision-making and services, and on the experience of tenants and staff. This includes taking responsibility for your own performance and for meeting relevant professional standards.

Each part of the code comprises a set of principles and detailed expectations. Where requirements apply differently to different groups (board members, involved tenants and staff), we use subheadings within the relevant section to distinguish them. These headings are marked with a colour-coded BM (board member), S (staff), IR (involved tenant).

Application of the code

The code cannot aim to cover every situation in which people may find themselves as they perform their roles.

Even where it does not contain specific requirements, you need to apply good judgement, using the principles of the code. For example, it will be important in any situation to consider how an action taken or decision made aligns with the housing

association's purpose and values, and what impact it may have upon tenants and the housing association's reputation.

Compliance with the code

The code covers the conduct of individuals and although we have provided compliance checklists for other codes, the administrative burden of evidencing every individual's compliance would be disproportionate.

HHT will ensure that this Code is embedded across the organisation. It will be made accessible to everyone to whom it applies and to tenants, kept under regular review and supported by clear arrangements for raising concerns about potential breaches. Alleged breaches will be considered through the appropriate disciplinary, governance, complaints or other relevant procedure.

HHT will give tenants meaningful opportunities to influence and scrutinise the development and review of this Code and decisions about its adoption or amendment.

Jargon buster

This jargon buster explains key terms used in HHT's Code of Conduct. **Board**

Includes any board of management, management committee, board of trustees, and all similar governing bodies however named.

Board member

Includes all members of governing bodies whether they are formally known as non-executive directors, trustees, board members, management committee members, etc. It includes co-optees and any other nominees, whether or not they enjoy voting rights, and all members of sub-committees who are not also members of the main governing body.

Close connections

In broad terms, means your family, relatives, close friends or business partners, as well as businesses in which you have an interest through ownership or influence. The term includes (but is not limited to) your spouse, unmarried partner or civil partner, children, siblings, grandchildren and grandparents. If you are unsure, it is best to err on the side of caution by acknowledging that there may be a close connection and acting accordingly.

Contractors

Includes those other than board members, staff and involved tenants who are directly involved in delivering the housing association's business activities. This includes contractors, sub-contractors, consultants and agents.

Culture

Organisational culture can be simply described as 'how we do things around here' - it's the sum total of shared values, attitudes and behaviours that shape how people perform their roles in a housing association and how tenants experience the services they receive.

Impact on the environment and sustainability

This means the effect your actions or decisions may have on the natural environment. This includes climate change, carbon emissions, energy and water use, waste, pollution, biodiversity and the responsible use of resources.

Involved tenant

Includes tenants and other customers who are formally involved in delivering, or scrutinising, the housing association's business activities.

Known relationship

For the purposes of this code, this means relatives and close connections (see definition above). Relationships with acquaintances i.e. people you know, but not very well, are not covered by this term.

Personal familiarity

For the purposes of this code, this refers to forming relationships that compromise, or could reasonably be perceived to compromise, professional boundaries, objectivity, independence of judgment or proper governance arrangements.

Professionalism

A set of behaviours which reflects the standards, skills, competencies and ethics associated with a role.

Protected characteristics

Distinguishing features or traits of groups and individuals which are protected under the law from discrimination and unfair treatment. The protected characteristics under the Equality Act 2010 are age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race including colour, nationality, ethnic or national origin, religion or belief, sex and sexual orientation.

Tenants

Throughout the code, we use the term ‘tenants’ to include tenants, tenants, leaseholders, shared owners and users of other services provided by the housing association. Organisations with customers who are not tenants (e.g. recipients of other services) may wish to amend the term to read ‘tenants and other customers’.

Staff member and staff

Includes HHT’s employees and any other persons fulfilling the role of a paid employee, such as those deemed to be workers, interim placements, or those on secondment from another organisation. This includes directly employed operatives working in areas including repairs and maintenance, grounds maintenance, communal cleaning and safety compliance. The code shall also apply to those working with HHT in a volunteering capacity.

Strategic objectives

Specific goals an organisation sets itself in order to achieve its strategy. These are the things the organisation plans to do to get from where it is now to where it would like to be in the future.

Code of conduct

1. Acting in the best interests of tenants and the housing association

You have a responsibility to carry out your role in a way that supports the interests of current and future tenants and is in line with the purposes and values of the housing association.

A. Meeting your responsibilities

The principle

You must act in good faith, putting aside personal gain and making decisions that support the interests of tenants as a whole and are in the best interests of the housing association.

Expected of all BM S IR

A1 You must always try to fulfil the requirements of your role to the best of your ability. If any circumstances arise that limit your ability to meet your responsibilities, you must raise this through the appropriate channels.

A2 In carrying out your role, you must always seek to further the housing association's strategic objectives, reflecting the housing association's desired culture.

A3 You must not act in a way that discriminates against, or unfairly favours, particular individuals, groups or interests, including on the basis of any protected characteristics they may have.

A4 You must consider the impact of your actions on the safety and wellbeing of tenants.

Expected of board members and involved tenants BM IR

A5 You must respect and take responsibility for decisions that are made by the group(s) of which you are a member, even if you do not personally agree with them.

Expected of staff members S

A6 You must consult your manager before taking any other paid or voluntary work that may interfere with your ability to act in line with the housing association's purpose, or conflict with the terms set out in your contract of employment.

B. Representing the housing association

The principle

In representing the housing association in any capacity, including at external events, in dealings with outside bodies and on social media, you are an ambassador for the housing association and must uphold and promote its values, objectives and policies.

Expected of all BM S IR

B1 In representing the housing association, you must act in accordance with its values, policies and goals.

B2 You must not conduct yourself in a manner that could reasonably be regarded as bringing the housing association into disrepute through dishonest, misleading or inappropriate behaviour.

B3 You must not make knowingly false, malicious or misleading statements about the housing association or those connected with it.

B4 You must not seek to officially represent the views or position of the housing association unless authorised to do so.

B5 When representing the housing association through any medium, including social media, you must at all times act with professionalism.

B6 Where any personal social media accounts refer to your role with the housing association, you must make it clear in what capacity you are communicating.

Expected of board members and staff BM S

B7 If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect the housing association, you must obtain appropriate prior consent from the housing association. Such consent must not be unreasonably withheld unless your activity poses a material risk to the association.

2. Behaving with integrity

By integrity, we mean that you must act honestly, transparently and in line with the highest standards of ethical conduct. The reputation and good name of the housing association depends on compliance with this code, and with the laws, policies and procedures that it refers to.

C. Conflicts of interest

The principle

You must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between your duties to the housing association and your personal interests, other duties and relationships.

Expected of all BM S IR

C1 You must formally declare to the housing association, at the earliest opportunity, any interests, roles and relationships that could - or could reasonably be perceived to - affect your ability to act in the best interests of tenants as a whole and of the housing association; you must make sure that these interests do not interfere with your ability to carry out your role effectively.

C2 You must declare any known relationship to a tenant, potential tenant or other customer of the association where this could reasonably be perceived to influence your role. You must not be involved in decisions relating to their relationship with the housing association or seek or accept preferential treatment for them.

C3 You must declare any known relationship to a member of staff or board member where this could reasonably be perceived to influence your role. You must not be involved in decisions relating to their relationship with the housing association or seek or accept preferential treatment for them.

C4 You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to the association and must not be involved in their appointment, performance management or reward.

C5 Except where specifically permitted, as set out in the housing association's relevant policy, you must avoid using its contractors and suppliers for private purposes.

C6 You must not use, or attempt to use, your position to secure personal benefit or advantage for yourself or any connected person, business or organisation.

C7 You must not seek to influence decisions improperly, including by applying pressure, offering inducements, or using personal relationships to secure preferential outcomes.

Expected of board and staff members BM S

C8 You must declare any known relationship to a person applying for or performing a role within the housing association and must not be involved in their appointment, performance management or reward.

Expected of board members and involved tenants BM IR

C9 You must be clear about the role you are acting in and must not use your position to influence individual service decisions or treatment for yourself or others.

C10 You must act independently and fairly, avoiding involvement in individual operational matters unless this is part of an agreed role.

C11 Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to take all reasonable steps to address the conflict. These should include being willing to resign if the conflict is material or long-standing and, in the opinion of the relevant board, committee or other group, cannot be managed appropriately. For tenants, a conflict could include a matter being discussed that relates specifically to the individual's home. It should not prevent tenants taking part in discussions about matters that affect larger groups of tenants.

Expected of involved tenants IR

C12 You must not be involved in any recruitment or selection process where you have a close connection with a person applying for the role.

D. Bribery, gifts and hospitality

The principle

In your role with the housing association, you must not allow gifts, hospitality or other benefits to influence, or be perceived to influence, your judgement or behaviour.

Expected of all BM S IR

D1 You must not seek or accept preferential treatment in the provision of benefits such as employment or housing accommodation.

D2 You must not solicit or seek gifts or hospitality or other benefits in connection with your role.

D3 Any gifts or hospitality offered to or by you must be either declared or declined according to your housing association's policies.

D4 If you are offered a bribe, hospitality or a gift, which is or may be in return for expected preferential treatment, you must decline and declare this immediately to the appropriate person.

Expected of involved tenants IR

D5 You must not seek or accept preferential treatment in the provision of housing or related services.

E. Funds, resources and personal benefit

The principle

You must use the housing association's funds, resources and assets responsibly, transparently and only for proper purposes.

Expected of all BM S IR

E1 You must ensure that the housing association's funds and resources are used properly and efficiently.

E2 Your procurement decisions must be guided by the housing association's policies and fairness in decision-making and in line with relevant law.

E3 You must take all reasonable measures to protect the housing association's funds, resources, property and assets from fraud, theft, damage and misuse.

E4 If you claim reimbursement for any expenses, you must do so in line with the housing association's policies and procedures.

Expected of board members BM

E5 If you are making decisions about litigation, you must ensure that funds and resources are used properly and efficiently with consideration of financial, operational and reputational risk.

F. Confidentiality

The principle

You must handle information that is provided to you in your role responsibly and lawfully, balancing confidentiality, commercial sensitivity and legal obligations with openness, transparency and accountability.

Expected of all BM S IR

F1 You must not disclose, without the required permission and authority, any personal data about tenants, staff or colleagues. This duty continues to apply after you have left the housing association or stepped down from your position.

F2 You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left the housing association or stepped down from your position.

F3 You must not, without authority, pass or distribute to the press or media or any other external recipient any unpublished information or materials relating to the association, unless you are doing so in accordance with the housing association's whistleblowing policy and procedure.

F4 You must not prevent another person from gaining access to information to which they are entitled by law and should support transparency where appropriate.

G. Working with tenants

The principle

You must act fairly and properly in your dealings with tenants, including listening to their views and being accountable for your actions.

Expected of all BM S IR

G1 You must seek and value views from tenants when making decisions that will affect them.

G2 You must not allow any personal relationship with a tenant to influence how you discharge your role and responsibilities.

G3 You must not give personal gifts or loans of money to, or receive personal loans or gifts of money (including will bequests) from, tenants.

G4 You must handle tenants' money only where absolutely necessary and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with the association's financial policies, procedures and controls to ensure appropriate handling of any and all funds.

G5 You must not invite or influence a tenant to make a will or trust under which you are named as executor, trustee or beneficiary.

Expected of staff and board members BM S

G6 You must maintain appropriate boundaries with staff and tenants and must not allow personal relationships to influence how you carry out your role.

Expected of involved tenants IR

G7 When you advocate for issues, concerns or experiences raised by tenants or communities, you must do so honestly and without seeking unfair advantage or preferential treatment.

H. Reporting concerns

The principle

You must report to the appropriate person within the organisation any reasonable suspicions you have about possible wrongdoing in line with this code or your organisation's relevant policies and procedures.

Expected of all BM S IR

H1 If you have a concern about possible wrongdoing, you must immediately report it via the appropriate internal channel or external body. This includes becoming aware of potentially dishonest or fraudulent activity, and material breaches of this code or relevant legislation, including health and safety.

H2 If you believe that you are being required to act in a way which conflicts with this code or legislation, you must immediately report it via the appropriate channel.

H3 You must not victimise, disadvantage or treat unfairly anyone who raises a concern, makes a complaint, or uses whistleblowing or reporting procedures in good faith.

3. Treating others fairly, with respect and empathy

The way in which people behave towards each other is fundamentally important to the experience of tenants and staff of the housing association. Respectful, fair and empathetic behaviour is essential to building trust, maintaining effective relationships and supporting a healthy organisational culture.

I. Fairness, respect and empathy

The principle

You must treat all others with fairness, respect and empathy, regardless of role, status or circumstances. You must recognise where you have power and authority in your role and use this in a way that is responsible and, where possible, empowers other people.

Expected of all BM S IR

I1 You must treat everyone you engage with through your role with respect, politeness, consideration and empathy.

I2 You must respect individuals' chosen identities, backgrounds, protected characteristics and lived experiences, and avoid making assumptions about others.

I3 You must act in ways that contribute to an inclusive environment, where people feel fairly treated, respected and listened to and where they feel able to raise concerns.

I4 You must not harass, bully, intimidate or discriminate against others, or engage in behaviour, including subtle or repeated behaviours, that could reasonably make others feel marginalised, threatened, patronised or dismissed.

I5 You must not display materials in the housing association workplace or use language in the performance of your role which other people might reasonably find offensive.

I6 You must report through appropriate channels any instances of unfair or unequal treatment associated with the housing association and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and respecting confidentiality.

Expected of staff S

I7 If your role includes working in tenants' homes, you must behave respectfully and with care, recognising that you are entering someone's home. This includes respect for people's privacy, preferences and personal property.

J. Professional relationships

The principle

Board members, staff and involved tenants must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.

Expected of all BM S IR

J1 You must not ask or encourage anyone to commit wrongdoing, including any breach of this code.

J2 You must behave in a professional manner appropriate to your role, maintaining independence and integrity at all times. You must conduct relationships with other people who hold roles at the housing association (whether involved tenants, board members or staff) on an appropriately professional footing.

J3 You must challenge language or behaviours that reinforce stigma about tenants or social housing.

J4 You must welcome constructive challenge and respectful disagreement from others, and offer challenge to others in a constructive and respectful way.

Expected of board members BM

J5 Your relationships with staff and tenants must be constructive and professional.

J6 You must set an example by demonstrating the highest standards of honesty and ethics and your alignment with the values, policies and objectives of the housing association.

Expected of board members and involved tenants BM IR

J7 Where it is necessary to raise issues of staff, board or contractor performance, these must be raised constructively and through the appropriate channels.

J8 Unless you have specific and, where practicable, written delegated authority to do so, you must not individually give instruction or direction to any member of staff or contractor.

Expected of staff members S

J9 You must avoid, in a professional setting, inappropriate personal familiarity with board members and involved tenants.

J10 You must not use informal channels to lobby or influence board members or involved tenants on matters of the housing association's business.

J11 You must not knowingly mislead the board or any of the housing association's committees or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.

4. Taking responsibility for the impact of your actions

You have a responsibility while on the housing association's business to consider the immediate and longer-term impact of your actions and to be accountable for them.

K. Tenant experience

The principle

You must anticipate and take responsibility for the impact that your conduct, actions and decisions may have on tenants.

Expected of staff S

K1 You must consider how your conduct, actions and decisions may impact on tenants.

K2 You must be prepared and able to offer tenants a clear explanation for actions or decisions you take, especially where these directly affect them.

K3 You must respond constructively to feedback about your actions, decisions and performance, by whoever this is provided.

L. Health, safety and wellbeing

The principle

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

Expected of all BM S IR

L1 You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk. When you take actions and make decisions, you must consider the impact your action or decision may have on the safety and wellbeing of others.

L2 If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or a group of individuals connected with the association, you must report this immediately through the appropriate channels.

M. Environment and sustainability

The principle

Within your role at the association, you must consider, and try to avoid or reduce, negative impacts on the environment and sustainability.

Expected of all BM S IR

M1 In carrying out actions or making decisions in the performance of your role, you must consider the environmental impact of your decisions and, where you are able, seek to achieve positive environmental outcomes.

M2 You must take reasonable steps to reduce unnecessary waste and resource use.

N. Digital and data

The principle

You must ensure that your use of digital systems, data and emerging technologies is responsible and protects tenants, staff and the housing association itself from harm.

Expected of all BM S IR

N1 You must take reasonable steps to protect sensitive information from loss, misuse or unauthorised access.

N2 In carrying out your duties, you must use digital systems, devices and tools only in ways which are formally permitted by the housing association. You must report any suspected data breach, cyber security breach or concern, and any other digital threat or vulnerability. immediately through the appropriate channels.

N3 In using digital systems, data and emerging technologies within your role, you must take care to avoid use that may be misleading, discriminatory or otherwise inconsistent with the housing association's values and responsibilities.

N4 You should be transparent and proportionate in any permitted use of artificial intelligence and must take care to maintain human judgement and accountability in such use.

5. Acting with diligence and care

The diligence and care with which roles are performed has a significant impact upon the quality of decision-making and services and the experience of tenants and staff. This includes taking responsibility for your own performance and for meeting relevant professional standards.

O. Learning and development

The principle

In partnership with the housing association, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

Expected of all BM S IR

O1 You must play an active part in the housing association's supervision and performance appraisal processes as they apply to your role.

O2 You must make personal training and development needs relevant to your role known to the organisation and must undertake all mandatory training for your role.

O3 Unless there are exceptional reasons, you must attend learning and development events as required and apply learning to your role.

Expected of board members BM

O4 You must keep your knowledge up-to-date in those areas in which you are a specialist, as well as keeping abreast of matters relating to your organisation and the wider sector(s) within which it operates.

Expected of staff members S

O5 You must take responsibility for your own professional development. Where your role requires continuing professional development (CPD), you must keep this up-to-date and maintain any required records.

P. Acting with care and diligence

The principle

You must act with care and diligence in making sure that you understand your role and its requirements, and that you are equipped to carry out your duties.

Expected of all BM S IR

P1 You must take care to understand the responsibilities of your role, including relevant legal, regulatory and policy requirements.

P2 You should prepare properly for any meetings, decisions and activities where you will be required to contribute views, to scrutinise or to make decisions.

P3 If you become aware of a problem where action is required, you must not ignore, conceal or minimise the issue.

P4 In carrying out your role, you should recognise the boundaries of your responsibilities and must escalate issues or risks as needed, particularly where these may impact tenants, services, safety or the reputation of the organisation.

Q. Continuous improvement

The principle

You must support a culture of learning and continuous improvement through acting in an open and accountable manner, recognising mistakes and learning from feedback to help the housing association to continue to improve outcomes.

Expected of all BM S IR

Q1 You must demonstrate openness to learning from a range of opportunities, including tenant scrutiny, complaints and other feedback.

Q2 You should offer open and constructive feedback to others and invite feedback about your own performance.