



Code of Conduct

**Our code for employees, Non-Executive Directors,
Involved Residents and Contractors.**

Updated
July 2017

Our way of working

We put **people first**: we keep **people at the heart** of everything we do and **value their differences**.

We say what we mean and **mean what we say**: we are **clear and consistent** in what we do. **We love what we do** and why we do it: we enjoy and take **pride in our work**. We are **positive**: we make things happen and **achieve results**.

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1. Introduction

Victory Housing Trust (Victory) has based this Code of Conduct primarily on a National Housing Federation model Code. It sets out the specific conduct required of all individuals directly involved with Victory and ensures we engage with each other in a professional manner, with dignity and respect, showing integrity and avoiding any suggestion of influence by biased or improper motives.

All Employees, Non-Executive Directors, Involved Residents and Contractors* must familiarise themselves with the contents and act in accordance with its principles and provisions at all times. The Code cannot cover every situation you may face in your everyday role. You may find yourself faced with difficult situations or faced with an unexpected dilemma. If Non-Executive Directors or Involved Residents have any doubts or questions regarding the application of the Code, or in relation to a specific issue, they should seek advice and guidance from their respective Chair or the Company Secretary. Employees should seek advice and guidance, where appropriate, from their Line Manager, the Human Resources and Training Manager, or the Company Secretary. Contractors should seek advice and guidance from the appropriate Victory Manager.

The Code is consistent with the seven principles of public life (see appendix 2). Although Victory is not a public body, the provision of social housing is a public function and Victory recognises the need to uphold the same values of selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

Associated policies and procedures

The Code of Conduct should be read in conjunction with Victory's policies and procedures which are relevant to your role, including:

- Governance and Financial Viability Policy
- Employee Handbook
- Behavioural Competency Framework.

Breach of code

You must familiarise yourself with the contents of the Code and act in accordance with its principles and procedures at all times. Failure to comply with the Code may be an employment or governance disciplinary or contract breach matter. If you believe there has been a breach of the Code you should report the breach to the Company Secretary.

Where you are in doubt about a possible breach of the Code, you are encouraged to report your concerns or to seek advice at the level that you feel is appropriate. Anyone who has concerns about misconduct and reports this in good faith will have nothing to fear and will be supported by Victory.

*Throughout the Code the term 'Contractor/s' will include contractors, consultants, suppliers and service providers, and covers all sections unless specified otherwise.

A. General Responsibilities

Main Principle

You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of Victory, its residents and other service users.

- A1.** You must comply with the law, your terms of appointment and Victory's policies and procedures relating to your role.
- A2.** You must not conduct yourself in a manner which could reasonably be regarded as bringing Victory into disrepute. This includes membership of, or participation in, activities organised by groups or organisations whose values are inconsistent with Victory's (for instance, racist organisations) which could create reasonable doubt in your ability to comply with Victory's values and this Code.
- A3.** You must not bring Victory's name into disrepute or affect its integrity by your actions or words, either within the organisation or outside. This includes the use of, or entries on, social networking sites (such as Facebook, Twitter, YouTube and others). This includes making derogatory comments about Victory, its residents or other service users, partners or services, either in person or in writing or via any web-based media such as a personal blog or other site. This also applies if you do not name Victory but where its identity can reasonably be inferred, or where you use a pseudonym but your identity can reasonably be inferred.

If you have a genuine concern about possible wrongdoing, you must report it to the appropriate senior person within the organisation. (See section M).

- A4.** You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.
- A5.** You must respect the appropriate channels for handling tenancy and service provision issues. You must not act outside Victory's established procedures in any matter concerning any resident or other service user.
- A6.** You must not misuse your position, for example, by using information acquired in the course of your duties for your private interests or those of others.
- A7.** You must respect the principle of collective decision-making and corporate responsibility. This means that once the board has made a decision you must support that decision.
- A8.** You must not engage in any political or campaigning activity that might compromise the position of Victory. Non-Executive Directors or Involved Residents intending to stand for political office should discuss the matter with their respective Chair, whilst Employees should discuss the matter with their

Line Manager. Contractors should immediately inform the appropriate Victory Manager.

- A9.** Non-Executive Directors and Involved Residents, taking up new employment or appointments during their term of office must make any necessary declarations of interest. Any such work or position must not interfere with your role.
- A10.** Employees must consult their manager before taking on any outside work or any position, paid or unpaid. Any such work or position must not interfere with your existing job or conflict with the interests of Victory.

B. Conflicts of interests – For Staff, Non-Executive Directors and Involved Residents

Main Principle

You must take all reasonable steps to ensure that no undeclared conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise. This section applies to you as an individual and family members and close connections (see definition in the glossary – appendix 1). Victory recognises that it is unreasonable to expect Employees, Non-Executive Directors and Involved Residents to question all their friends and family to identify a potential conflict with their duties. However, once discovered, you are obliged to declare the conflict as soon as practicable.

- B1.** You must comply with Victory’s procedures for declaring, recording and handling conflicts of interest. Amongst other things, you must declare any personal and business interests relating to yourself or others to whom you are related or closely connected, which may, or may be perceived to, conflict with the duties of your role, including but not limited to:
1. Employment, self-employment,
 2. Company directorships, business partnerships,
 3. Ownership or significant shareholding in a company or partnership, providing products or services to Victory or other Housing Associations,
 4. Significant ownership of land and/or property in Victory’s area of operation,
 5. Tenancy or leasehold interest of a property owned by Victory,
 6. An interest in any property being sold by Victory,
 7. Membership of a campaigning, residents’ or community association which has interests in the business and/or operation of Victory,
 8. Positions of public responsibility,
 9. Membership of another association or unregistered “not for profit” body, with interests in the area of operation of Victory,
 10. Membership of secret societies and similar organisations.
- B2.** You must ensure that your entry in Victory’s register of interests is complete, accurate and up-to-date.
- B3.** You must comply with Victory’s procedures relating to the application for employment or housing from Employees, Non-Executive Directors, Involved Residents or others to whom they are related or closely connected. Victory’s policies and procedures are designed to ensure, and to demonstrate, that no preferential consideration is given to any such application. Sales of properties under the Stock Realignment Policy may not be made to any Employee or Non-Executive Director or any of their family members or to any organisation connected with any Employee or Non-Executive Director or any of their family members (as all these terms are defined in Appendix 1).

- B4.** You must not be involved in the appointment of Employees where you are related, or are closely connected to an applicant. You must declare any such relationship to the appropriate person. You must not be involved in decisions relating to discipline, promotion, pay or benefits for any Employees to whom you are related or closely connected.
- B5.** You must not be involved in the appointment of a contractor or supplier where you are related, or closely connected, to an organisation or individual applying or tendering for a contract. You must declare any such relationship to the appropriate person. You must not be involved in establishing the terms of a contract, or its on-going monitoring and management, where you are related, or closely connected, to the contractor or supplier.
- B6.** Payment or grant of a benefit is not permitted to a commercial business trading for profit of which a Non-Executive Director or Employee or close relative of an Employee is a principal proprietor or is directly concerned in the management of the business.
- B7.** Except where specifically permitted, you must normally avoid using Victory's contractors and suppliers for private purposes. Where this is unavoidable, you must not receive a favourable service as a result of your connection with Victory. Prior approval must be sought before using the supplier or contractor and a written declaration made confirming that no financial or other advantage has been secured as a result of the relationship with Victory.
- B8.** You must not use, or attempt to use, your position to promote your personal interests or those of any connected person, business or other organisation.
- B9.** Where possible, Non-Executive Directors and Involved Residents must declare any interests at the start of the meeting under the relevant standing agenda item. There may, however, be occasions when an individual's interest becomes apparent only when the item is under consideration.
- B10.** Board approval will be required prior to an offer of employment or housing to any Non-Executive Director or member of the Leadership Team together with their family members (as defined by appendix 1).

C. Bribery, gifts and hospitality

Main Principle

You must not offer, seek or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisations.

For Staff, Non-Executive Directors and Involved Residents:

- C1.** You must comply with the law and Victory's policies and procedures in relation to bribery and corruption; and the giving, receipt, approval and recording of gifts and hospitality.
- C2.** You must not canvass or seek gifts or hospitality or other benefits.
- C3.** If you are offered gifts or hospitality, they should either be declined, or prior approval sought for their acceptance. The only exceptions are gifts of token value or modest hospitality given in connection with normal work meetings. Any gifts accepted will be pooled and randomly raffled to staff. No personal benefit to individuals or groups of Employees is permitted.
- C4.** Business lunches are permissible but must have the consent of an Executive Director and must be recorded on the Register of Gifts and Hospitality.

For Contractors:

- C5.** If you are offered gifts or hospitality, they should be politely declined.

D. Funds and Resources

Main Principle

You must not misuse Victory's funds or resources.

- D1.** You must comply with Victory's policies and procedures regarding the use of its funds and resources. 'Resources' includes Employees, information, telephone, computer and other IT facilities, equipment, stationery and transport.
- D2.** You must ensure that the organisational funds and resources entrusted to you are used efficiently, economically and effectively.
- D3.** You must comply with Victory's policies and procedures regarding procurement, ensuring value for money and fairness in decision making.
- D4.** You must take reasonable measures to protect Victory's funds, resources, property and assets from theft, damage and misuse.
- D5.** You must comply with Victory's policies and procedures relating to the acceptable or unacceptable use of email, intranet and internet services. Amongst other things, these policies and procedures prohibit access to pornographic or racist material and the use of unauthorised or unlicensed software.
- D6.** You must claim reimbursement only for expenditure that was properly and reasonably incurred in carrying out Victory's business. You must ensure that any expenses claim you make is accurate and complies with Victory's policies and procedures.
- D7.** Non-Executive Directors will be paid agreed levels that are proportionate to Victory's size, complexity and resources and in accordance with their Letter of Appointment. Payment will be linked to the carrying out of specified duties against which performance will be reviewed and may be disclosed on a named basis. Non-Executive Director payment will be assessed, controlled and monitored through an approved payment framework mechanism.

E. Confidentiality

Main Principle

You must handle information in accordance with the law and Victory's policies and procedures.

- E1.** You must comply with the provisions of the Data Protection Act 1998 which governs the protection of personal data. All personal data held about residents and other service users, Employees and others, whether on paper or electronically, is subject to the provisions of the Act. Victory's policies and procedures give further guidance.
- E2.** You must not disclose without authority any confidential business information. This duty continues to apply after you have left Victory or relinquished your position.
- E3.** You must not, without permission, pass or distribute to the press or media or any other external recipient(s) information or materials relating to Victory.
- E4.** In your capacity as a Non-Executive Director or Employee or Involved Resident or Contractor you must not, without prior authority:
- Appear to represent the views or position of Victory
 - Write letters to the press or other recipient(s)
 - Write media articles, blog posts or tweets etc., about Victory and its activities
 - Make comments or statements to the media – if approached you must pass the enquiry to the appropriate person.
- E5.** You must not prevent another person from gaining access to information to which they are entitled by law.
- E6.** As part of our transparency agenda, we will publish certain personal information which relates to individual, including details of:
- Recruitment and Selection Procedures for Non-Executive Directors;
 - Non-Executive Director and Executive Director profiles and dates of appointment,
 - Remuneration of Non-Executive Directors and Executive Members.

F. Respect for others

Main Principle

You must treat others with respect at all times.

- F1.** You must comply with the law and with Victory's policies and procedures relating to equality and diversity. Equality laws prohibit discrimination on grounds including age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and impose positive duties to eliminate unlawful discrimination and promote equality.
- F2.** You must not harass, bully or attempt to intimidate any person.
- F3.** You must not display materials in the workplace which other people might reasonably find offensive or use language which board or work colleagues or customers might reasonably find offensive.

G. Relationship between Non-Executive Directors, Employees, Involved Residents and Contractors

Main Principle

Non-Executive Directors, Employees, Involved Residents and Contractors must maintain a constructive, professional relationship based on a sound understanding of their respective roles.

Non-Executive Directors

- G1.** You have a duty of loyalty and support towards Victory and this must be reflected in a constructive, professional relationship with its Employees.
- G2.** You must not go beyond your role as a Non-Executive Director and become inappropriately involved in operational matters or have a financial interest with one of Victory's Contractors.
- G3.** In your dealings with staff, formally and informally, you must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies and objectives of Victory.

Non-Executive Directors and Involved Residents

- G4.** Where it is necessary to raise issues of poor Employee(s) performance at a formal meeting, these must be raised in a constructive way, aimed at getting things right in future, and not at criticising individuals. Any concerns about the performance of individuals must be discussed in confidence with the Chair of the Board, Committee or Panel, or with the Chief Executive.
- G5.** You must not appear to undermine the authority of a Senior Officer in his or her dealings with a more junior Employee.
- G6.** You must avoid inappropriate personal familiarity with Employees.
- G7.** You must not ask or encourage an Employee to act in any way which would conflict with compliance with this Code or Victory's policies and procedures.

Involved Residents

- G8.** You must not seek to instruct or direct an Employee or contractor. The relevant manager or Employee must convey all instruction.

Employees

- G9.** If your work brings you into contact with the Board, a committee or a residents'/service users' committee or panel, you must:
1. take direction from the Board, or in accordance with any delegated authority of a committee or panel;
 2. respond constructively to questioning or challenge;
 3. respond willingly to requests for information.
- G10.** You must avoid inappropriate personal familiarity with Non-Executive Directors, Involved Residents and Contractors.
- G11.** You must not use informal channels to lobby or influence Non-Executive Directors, Involved Residents or Contractors on matters of Victory's business.
- G12.** You must not knowingly mislead the Board or any of Victory's committees or panels. In presenting information you must set out the facts and relevant issues truthfully.

Contractors

- G13.** If your work brings you into contact with the Board, Staff a committee or a residents'/service users' committee or panel, you must:
1. take direction from Victory Staff
 2. respond constructively to questioning or challenge
 3. respond willingly to requests for information.
- G14.** You must avoid inappropriate personal familiarity with Staff, Non-Executive Directors and Involved Residents
- G15.** Declare any interests you might have at the start of and during your contract with Victory.
- G16.** If any member of Victory Staff or Non-Executive Director has a financial interest in your company, you may be excluded from working with Victory.
- G17.** Any allegations of harassment by you or against you will be treated seriously, investigated and dealt with in accordance with the terms of the breached policy.
- G18.** A designated member of Victory staff is responsible for recording and analysing any complaints against contractors. This information will be provided to the relevant Director, who will use it when assessing the overall performance of the contract.

H. Relationship with residents and other service users

Main Principle

You must maintain high standards of professionalism, fairness and courtesy in all your dealings with residents and other service users.

- H1.** You must treat all residents and other service users with courtesy and respect.
- H2.** You must not allow any personal relationship with a resident or other service user to conflict with your role and responsibilities.
- H3.** You must not give gifts or loans of money to, or receive loans or gifts of money from, residents or other service users.
- H4.** You must take great care in handling residents' and other service users' money, ensuring that a receipt is completed for every transaction.
- H5.** You must not invite or influence a resident or other service user to make a will or trust under which you are named as executor, trustee or beneficiary.
- H6.** When handling information relating to residents and other service users, you must comply with the law and Victory's policies and procedures relating to the protection of personal data.
- H7.** For Contractors that come into contact with residents, you must also ensure:
 - 1. identification (which includes name, photograph, company and telephone contact) is shown when arriving at an occupied property, whether asked for it or not and explain the purpose of your visit. If the resident wishes to phone Victory in order to check that you are a legitimate contractor, you must respect their right to do this, and remain outside of the property until the resident is satisfied you are legitimate;
 - 2. an explanation is given, clearly and in lay terms, of what work is going to be carried out at the property, when it will be started and how long it is expected to take;
 - 3. to carry out the property works diligently and minimise inconvenience whilst undertaking works;
 - 4. disturbance and inconvenience is kept to a minimum and personal belongings of the occupier must not be moved without their permission or in their absence;
 - 5. you only use the occupier's home facilities (power supply, water supply or washing/toilet facilities) with their permission;
 - 6. to give special consideration to elderly or disabled residents or those with special needs;
 - 7. you have sufficient tools and equipment to complete the work and that the equipment is in good working order;

8. that you report any violent or aggressive incidents encountered whilst undertaking work in any home;
9. that you clear any rubbish and tidy the area of work on completion or at the end of each working day;
10. if additional parts or work is required, to advise the resident of a timescale when they can expect the work to be completed;
11. you repair or replace any item accidentally or wilfully damaged;
12. uphold the good reputation of both your own organisation and that of Victory.

H8. Contractors are also expected not to:

1. smoke, eat, drink or play audio equipment within properties;
2. carry out works in the home without the customer being present, unless their express consent is obtained;
3. Enter the resident's home without an adult present;
4. discuss any other customer details and refrain from commenting on previous work carried out;
5. leave tools, loose materials or equipment in the home or communal areas;
6. take photographs in any home without the occupier's permission;
7. accept any gifts or additional payments from residents.

H9. If aware of any special requirements, such as two to attend or potentially difficult situations, Victory will notify the contractor in advance.

I. Safeguarding

Main principle

You must take all reasonable measures to safeguard vulnerable residents and service users from abuse and neglect. This includes vulnerable adults, children and young people.

- I1.** All Victory staff (including staff on temporary contracts and agency staff, Board Members), and contractors are responsible for working within the principles of the safeguarding. They have obligations to be proactive in looking out for and responding to signs of abuse. They are required to take action, in line with the safeguarding procedures, where they suspect or become aware of alleged or actual abuse against vulnerable adults, children or young people.

- I2.** In all situations where you identify/ suspect abuse you should
 - a. Report it – using the relevant safeguarding procedure
 - b. Consider safety – of the child/ vulnerable adult; anyone else
 - c. Listen to the child/ vulnerable adult; offer general reassurance but be careful not to influence their perception of events
 - d. Do not guarantee confidentiality but explain what they must do and who they must tell and what you have to do
 - e. Keep careful records of all that is said or observed (but do not carry out an investigation yourself)
 - f. Do not confront the abuser unless this is action agreed with your manager/other agencies.

J. Health, safety and security

Main Principle

Your conduct must not endanger the health, safety or security of yourself or others.

- J1.** You must comply with Victory's health and safety policies and procedures and bring to the attention of the appropriate person any risks to yourself or others. In particular, where you are provided with protective clothing this must be worn, and for your own safety you must comply with Victory's policy and procedures relating to lone working.
- J2.** You must comply with the law and Victory's policies on smoking and on the use of alcohol, illegal drugs and other substances.
- J3.** You must comply with Victory's procedures relating to the security of premises.

K. Conduct at meetings

Main Principle

Your conduct at meetings must show respect for all, and comply with Victory's standards.

- K1.** You must respect the position of the meeting Chair, including sending apologies to the Chair or an appropriate officer, if you cannot attend or will be arriving late.
- K2.** You must be courteous and respectful to all other attendees by listening to all points of view and avoid interruptions when another person is talking.
- K3.** You must not use threatening or aggressive behaviour, or act in a disruptive way.
- K4.** You must not attend meetings while intoxicated or under the influence of drugs.
- K5.** Once a Board, Committee or Panel meeting has properly reached a decision, you must share responsibility for that decision, even where you had not supported it.
- K6.** All electronic devices should be silenced during meetings.

L. Representing Victory

Main Principle

In representing Victory at external events and in dealings with outside bodies, you are an ambassador for Victory and must uphold and promote its values, objectives and policies.

- L1.** You must not become involved in, or be seen to endorse, any activity that may bring Victory into disrepute. This includes but is not limited to illegal, immoral, racist or other discriminatory activity.
- L2.** In engaging in activities which promote the work of Victory to the outside world, you must demonstrate commitment to Victory and support for its values, policies and goals.
- L3.** In representing Victory at formal or informal events, you must be appropriately dressed for the occasion.

M. Social Media Charter

Main Principle

We want our social media pages to be a safe and inclusive place for all. Our Social Media Charter relates to the Corporate Social Media Accounts operated by Victory, including but not limited to Facebook and Twitter.

- M1.** Our social media accounts are monitored during office hours Monday to Friday and we aim to respond to all initial enquiries at the first point of contact.
- M2.** A Victory Social Media account or an account linked to Victory's activities may only be set up with approval from the Chief Executive at Victory.
- M3.** All information posted/published by Victory will comply with Victory's confidentiality and data protection policies, copyright laws will be respected, and reference or sources cited appropriately.
- M4.** Victory employees, customers, contractors, partners, or suppliers should not be referenced online without their prior consent, and photographs should not be posted without prior consent of the individual. Negative comments about named individuals will be deleted.
- M5.** When posting on Victory's social media pages, be polite, even if you disagree. Abusive language, aggression and bullying are not allowed (whether you're speaking to other users or Victory), and any derogatory comments made about residents' or employees' gender, ethnicity or other protected characteristic under the Equality Act will not be tolerated. Content that is Offensive or distressing to others will also be banned.
- M6.** Our social media pages are publically available so please do not post any personal information about yourself or others. We will only ever request that you send us these details via Private Message.
- M7.** Please do share your opinions on Victory's service via our public timeline, Feedback should be constructive and focus on a subject we can act on or respond to.
- M8.** We want to encourage a two-way dialogue, so we ask that you give us the ability to respond to all comments. Please do not post any false or misleading information about Victory or our contractors.
- M9.** Duplicate or spam posts/tweets will be removed.
- M10.** Messages posted that serve as advertisements or which promote yourself, an event or business (without Victory's consent to promote) will not be responded to and may be deleted.
- M11.** Anyone who becomes aware of unauthorised or inappropriate social networking activity should alert Victory.

M12. Victory retains the right to remove content posted to Facebook or block users from posting to our social pages for any other reason deemed necessary to ensure the safety and wellbeing of our online community.

Please note that a separate Social Media Policy covering the personal use of Social Media applies to all employees.

N. Learning and development

Main Principle

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

For staff, Non-Executive Directors and Involved Residents:

- N1.** You must play an active part in Victory's appraisal processes and welcome constructive feed-back.
- N2.** At the appropriate induction or appraisal meeting you must make clear your personal training and development needs so that they can be taken into account in Victory's forward budgeting and planning.
- N3.** Unless there are exceptional reasons, you must attend all learning and development events that have been arranged, either for you alone or as part of a group.
- N4.** Non-Executive Directors must take responsibility for keeping their knowledge up to date in those areas in which you are a specialist.
- N5.** Everyone should take responsibility for keeping up to date on key issues affecting Victory and be open to attending training events.

O. Reporting concerns

Main Principle

You must report to the appropriate senior person within Victory any reasonable and honest suspicions you may have about possible wrongdoing.

- O1.** If you are aware of potentially dishonest or fraudulent activity or material breaches of this Code – by Non-Executive Directors, Employees or others – you must report it to the appropriate senior person within Victory, or where appropriate use Victory’s Whistleblowing policy,
- O2.** If you believe that you are being required to act in a way which conflicts with this Code, you must report it to the appropriate senior person within Victory, or where appropriate, via the Whistleblowing policy.
- O3.** You must not victimise any person who has used – or intends to use, or is suspected of having used – Victory’s confidential reporting procedures to report the misconduct, or alleged misconduct, of others.

Code of Conduct

Appendices



Appendix 1

Terminology

1. **Non-Executive Directors**

Includes all members of Victory's Board whether they are known as directors, trustees, non-executive directors (sometimes referred to as board members), committee member etc. It includes co-optees and any other nominee whether or not they enjoy voting rights.

2. **Employees**

Includes all paid Employees within Victory, and any other person fulfilling the role of paid Employee, e.g. agency employees, potential employees or those seconded from another organisation.

3. **Residents**

This includes tenants, residents, leaseholders and users of other services provided by Victory.

4. **Involved Residents**

Includes residents and other service users (as defined above) who are involved in delivering or scrutinising Victory's business activities. This includes members of the Residents' Panel and Resident Involvement Groups, including ad hoc panels convened to assist in selecting contractors, resolve complaints or determine service standards etc.

5. **Contractors**

Contractor staff means people from out sourced service providers (works contractors, consultants, suppliers and service providers), including directors, managers and other employees engaged in activities under any contract with Victory which may require them to communicate directly with Victory staff or residents whether in person, by telephone or in writing. Examples include, but are not limited to, trade operatives carrying out repairs at a tenant's property, managers attending meetings at Victory's offices and administrative staff arranging survey appointments. Contractor's staff shall also mean persons engaged via subcontractors under a Victory contract.

6. **Family members and close connections**

6.1 **Family Members**

Family members include:

- a partner (someone to whom the individual is married, a civil partner or someone with whom they live in a similar capacity)
- parent, parent-in-law
- son or daughter, stepson or stepdaughter, the child of a partner

- brother or sister, brother or sister of a partner
- grandparent, grandchild
- uncle or aunt, nephew or niece
- the partners of any of these people
- any dependents and
- any person on whom the individual depends.

It would include estranged, separated and divorced family members (and estranged, separated and divorced persons who might reasonably be regarded as similar to family members).

6.2 Close Connections

A person with whom the individual has a 'close association' would be someone with whom they were in regular or irregular contact over a period of time who was more than an acquaintance. It would be someone a member of the public might reasonably think the individual would be prepared to favour or disadvantage when discussing a matter that affects them. It may be a friend, colleague, neighbour, business associate or someone known through general social contacts. It does not include a family member.

7. Connection with an organisation

Someone is connected with a company, partnership or other organisation if he or she, or a family member, or close connection:

- is employed by the organisation, either directly or as a sub-contractor or agent
- is a director, owner, non-executive director, trustee, or has some other controlling or financial interest in the organisation
- holds shares in the organisation, or has some other financial stake or interest in its success or
- if there is some other connection or link that a reasonable person could take to create a conflict of interest.

Appendix 2

Principles of public life

Employees, Non-Executive Directors and Involved Residents will inevitably face situations not directly addressed by the Code. In such situations they should be guided by the seven principles of public life established by the Committee on Standards in Public Life.

Although Housing Associations are not public bodies, there is a general acceptance that those holding positions of leadership in associations should uphold the same values of selflessness, integrity, objectivity, accountability, openness, honesty and leadership. These are defined below:

Selflessness: Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or friends.

Integrity: Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

Objectivity: In carrying out public business, including making public appointments, awarding contracts or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability: Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness: Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty: Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership: Holders of public office should support and promote these principles by leadership and example.

Appendix 3

When things go wrong – Breaches of The Code

1. Breaches

Employees, Non-Executive Directors, Involved Residents and Contractors should recognise that failure to follow this Code of Conduct may damage Victory and its work and so will normally be viewed as a serious matter. Where you are in doubt about a possible breach of the Code, you are encouraged to report your concerns or to seek advice at the level that you feel is important. Anyone who has concerns about misconduct, and reports this in good faith, will have nothing to fear and will be supported by Victory. Malicious complaints will be treated as a serious matter.

The following sections set out the approach that will be taken in the event that a concern is raised. Any decision whether or not to initiate investigatory action and/or disciplinary action together with any outcome will be treated as strictly confidential.

If an employee, Non-Executive Director or Involved Resident is accused of a breach, they will have the right of response as part of the investigatory process. In the event of a breach by a Contractor, their Company will have the right of response.

2. Employees

Allegations relating to a material breach of the Code of Conduct, will be investigated under the employee disciplinary procedures.

3. Non-Executive Directors

On receipt of allegations relating to a material breach of the Code of Conduct, the following procedure will apply:

- The Chair shall notify the Board and request the Company Secretary to instigate an investigation (where these officers are involved the Chair of the Audit Committee / or the Vice Chair of the Board and the Chief Executive shall take their place in relation to this procedure).
- The investigation shall be carried out by a person independent of the issue concerned, where necessary this may be an external investigator.
- The investigation shall be thorough and objective and shall establish the relevant facts to determine the appropriate response.
- If a significant breach of legal or regulatory requirements is alleged then the regulator shall be notified at an early stage.
- The result of the investigation shall be reported to the Board.
- The Board shall determine the action to be taken to rectify the position and any action necessary to avoid any repetition.
- Corrective action, including any action in relation to parties responsible for the breach, shall be proportionate to the scale and nature of the breach.

- Advice shall be obtained from appropriately qualified advisors if removal from office or termination of contract is proposed.
- If the investigation concludes that a significant breach of a legal or regulatory requirement has occurred or is likely to have occurred, the regulator will be informed.
- The decision of the Board will be final.

4. Involved Residents

On receipt of allegations relating to a material breach of the Code of Conduct by an involved resident, the following procedure will apply:

- Responsibility for investigating and determining the appropriate action to take will rest with the Residents' Panel, who will instigate an investigation.
- The investigation shall be carried out by a senior member of staff independent of the issue concerned, supported by external advice if necessary.
- The investigation shall be thorough and objective and shall establish the relevant facts to determine the appropriate response.
- The result of the investigation shall be reported to the Residents' Panel, who shall determine the action to be taken to rectify the position and any action necessary to avoid any repetition.
- Corrective action, including any action in relation to parties responsible for the breach, shall be proportionate to the scale and nature of the breach.
- Advice shall be obtained from appropriately qualified advisors if removal from office is proposed.
- The decision of the Residents' Panel will be final.
- The Board will be informed of all investigations undertaken and their outcome.

5. Contractors

On receipt of allegations relating to a material breach of the Code of Conduct, the following procedure will apply:

- The investigation shall be carried out by a senior member of staff independent of the issue concerned, supported by external advice if necessary.
- The investigation shall be thorough and objective and shall establish the relevant facts to determine the appropriate response.
- The Victory Leadership Team shall determine the action to be taken to rectify the position and any action necessary to avoid any repetition.
- Negotiations between Victory and the Contractor will be undertaken to resolve a dispute or difference arising at the earliest opportunity.
- Corrective or contract non-performance action, including any action in relation to parties responsible for the breach, shall be proportionate to the scale and nature of the breach.

- Any resulting action will be dealt with by a member of the Victory Leadership Team as a non-performance matter under the Terms of the Contract or Partnering Agreement.
- The decision of the Victory Leadership Team will be final.
- The Victory Board will be informed of all investigations undertaken and their outcome.