



EMPLOYEE CODE OF CONDUCT

We will provide this policy on request at no cost, in large print, in Braille, on tape or in another non written format.

Employee Code of Conduct

1. INTRODUCTION

We receive substantial public funds and are obliged to demonstrate to tenants and the public that we observe the highest standards of conduct from all employees who work for West Lothian Housing Partnership (WLHP). Our priority, therefore, is to provide customer service excellence to our tenants and customers.

This Code of Conduct is intended to outline good practice in areas, which may cause conflict between private interests and those of WLHP. This code does not affect individual's rights and responsibilities under law.

All employees should adhere to the expected standards of conduct in this Code and failure to observe these standards may result in disciplinary action up to and including dismissal.

It is the responsibility of each employee to monitor his/her own behaviour against the standards set. Should an employee be unclear on whether or not action would breach this code of conduct or otherwise breach WLHP's confidentiality or trust, he/she should discuss the matter with his/her immediate line manager or with Employee Relations.

2. PRINCIPLES

As an employee of a social landlord, employees are expected to uphold the 'Seven principles of Public Life' as identified by the Nolan Committee. These are:-

- **Selflessness:** employees should not take decisions, which will result in any financial or other benefit to themselves, their family or their friends. Decisions should be based solely on WLHP's best interests.
- **Integrity:** employees should not place themselves under any financial or other obligation to an individual or an organisation, which might influence them in their work with WLHP.
- **Objectivity:** any decisions, which employees take in the course of their work with WLHP, including making appointments, awarding contracts, or recommending individuals for rewards or benefits, must be based solely on merit.
- **Accountability:** employees are accountable to WLHP as their employer.
- **Openness:** employees should be as open as possible in all the decisions and actions that they take. They should give reasons for their decisions and should not restrict information unless this is clearly required by WLHP or by the law.
- **Honesty:** employees have a duty to declare any private interests, which might affect their work with WLHP.
- **Leadership:** if they are in a managerial position, employees should promote and support these principles by their leadership and example.

3. GENERAL STANDARDS

3.1 General Conduct

Employees should at all times maintain professional and responsible standards of conduct. In particular, employees are expected to:-

- carry out duties in accordance with WLHP's policies and procedures. These policies will be communicated by management and will be available to employees;
- observe the terms and conditions of their contract of employment;
- take reasonable care in respect of the health and safety of colleagues and third parties;
- comply with all reasonable instructions given by managers;
- show courtesy, efficiency, reliability, sobriety and punctuality;
- act at all times in good faith and in our best interests and those of our customers and staff.

3.2 Financial Conduct

Employees must ensure that all funds and resources entrusted on behalf of WLHP are used for the purpose intended and in a reasonable and lawful manner. Such funds and resources should be safeguarded from abuse, theft or waste. Employees should strive to ensure value

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for money for WLHP, its tenants and other customers and any public or charitable funds. Employees should be aware of, and comply with, WLHP's financial regulations, policies and internal controls.

It is a serious criminal and disciplinary offence corruptly to receive or give any gift, loan, fee, reward or other advantage in return for doing (or not doing) anything, or showing favour (or disfavour), to any person or organisation. WLHP maintains a register for acceptance and refusal of hospitality and gifts and all must be recorded. Please contact Wheatley Group's Governance team for further guidance.

If an allegation of corrupt behaviour is made, WLHP will conduct a full investigation to determine that any rewards received by employees have not been corruptly obtained.

3.3 Ethical Standards

WLHP and its employees must exercise good governance and judgment and maintain high ethical standards of honesty, integrity and probity.

The actions of employees should not be, nor give the impression, that they might have been influenced by a gift or consideration to show favour or disfavour to any person.

3.4 Confidential Reporting (Whistleblowing)

If, at any time, an employee has a concern about wrongdoing in any aspect of WLHP's affairs, they should notify this to WLHP in accordance with Wheatley Group's Policy on Whistleblowing.

4. RELATIONSHIPS

Each employee needs to achieve and maintain effective professional and working relationships with colleagues, Board Members and external contacts, including WLHP's residents and other customers. Integrity, objectivity and leadership are important, as is clarity; employees need to have a clear understanding of the work and duties of Board Members.

Employees are entitled to expect fair and reasonable treatment from their colleagues and managers. If employees feel that they have been unfairly treated or discriminated against, they are entitled to make use of WLHP's Grievance Policy.

4.1 Management Board

Employees are responsible to the WLHP Management Board, through the line management structure to the Chief Executive. Mutual respect between employees and Management Board members is essential, however, close personal familiarity could be prejudicial to this relationship and should be avoided. Employees should not use informal channels to influence Board Members on matters of Board business. If you are ever concerned about inappropriate conduct or attempts to influence by a Board Member, please raise this with your line manager.

4.2 Tenants and Other Customers

If an employee is involved in the delivery of services, he/she should always remember his/her responsibilities to the tenants and to the community he/she serves; ensuring courteous, efficient and impartial service to all groups and individuals.

It is good practice for officers to identify themselves when dealing with members of the public. An employee should give his/her name and job title to any customer or member of the public, if requested.

Any personal relationship with a tenant should not be allowed to conflict with the duties of employment or the best interests of any tenant. Employees must never allow themselves to be compromised by, nor should they take advantage of any relationship with tenants.

Employees may not receive loans from tenants and may not give loans from personal money to tenants.

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4.3 Potential Tenants and Other Customers

Any employee involved in the award of tenancies or allocation of housing, must ensure absolute impartiality in making decisions, avoiding any conflict of interests. All employees of WLHP must comply fully with any relevant regulatory requirements.

5. BALANCING OPENNESS AND CONFIDENTIALITY

WLHP wishes to act in an open and accountable way in relation to tenants, local communities, local authorities and other interested parties. As a general rule, information about WLHP's work, committees and employees should be available unless there are good reasons (confidentiality or practicality) for it to be withheld.

Tenants (and other individuals who use WLHP's services) have a right to confidentiality, and this must be respected. WLHP has a clear policy on Data Protection guidelines and disclosure of information.

The appearance of impropriety can be highly damaging to both employee and WLHP. It is vital that all tendering and purchasing decisions are made on an objective basis.

Fairness and impartiality must be exercised when dealing with consultants, suppliers, contractors and sub-contractors. All orders and contracts must be awarded on merit, by fair competition. WLHP has regulations and procedures for ensuring fair tendering or procurement processes. No special favour should be shown. The same applies to any business connected with current or recent former employees, their partners, close relatives or associates.

Confidential information on tender costs or other commercially sensitive information must not be disclosed to any unauthorised person or organisation.

Employees should avoid the use, for private purposes, of suppliers, contractors, consultants or other organisations used by WLHP, particularly where alternatives exist. This may not always be possible or practical. If an employee uses WLHP suppliers or contractors for personal services, he/she must achieve a separation between his/her personal purchasing decisions and those of WLHP. The employee must not give or receive favourable treatment. Where it is not possible to use alternative suppliers, contractors, consultants etc. this should be declared in writing to the Chief Executive.

An up to date list of contractors, consultants, other advisers, solicitors and auditors who work for WLHP is kept by the Secretary and is available for inspection by employees.

5.1 Openness

The law requires that certain types of information must be available to members, auditors, Scottish Housing Regulator, tenants, customers and the public. Employees should be aware of which information the Wheatley Group is open about, and act accordingly. Any doubts should be referred to management.

5.2 Confidentiality

Employees should be aware of the types of information that must be kept confidential. Personal information about WLHP's tenants, applicants for housing, other colleagues or individuals, must be regarded as strictly confidential. Information about such individuals may only be released outside the organisation with the written consent of the individual concerned. Exceptions to this will only be made by legal requirement and written permission from management must be obtained.

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Employees should not use any information obtained in the course of their employment for personal gain or benefit, nor should information be passed on to others who might use it in this way. Clarification can be sought from management or WLHP's Policy on Data Protection.

6.APPOINTMENTS AND OTHER EMPLOYMENT-RELATED DECISIONS

Employees involved in making appointments should ensure that these are made on the basis of merit alone. No appointment should be based on anything other than the ability of the candidate to undertake the duties of the post.

To avoid any accusation of bias, an employee must not be involved in an appointment where he/she is related to, or has a close personal relationship with an applicant outside of work.

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

Employees must not canvass the support of colleagues or Board Members for any candidate applying for employment. Employees must resist and report any attempt by others to do so. Managers may provide references to employees who have applied for posts internally. Guidance on providing references is outlined in WLHP's Employment References Policy.

Employees who are tenants (or have family members who are tenants) of WLHP may not use their position as an employee to gain any advantage or preferential treatment.

7.OUTSIDE ACTIVITIES

Activities outside of the work place are employees' own private business, but in some circumstances, could overlap or conflict with WLHP's interests. If in any doubt, employees should declare the matter to management and seek written permission.

Employees must obtain written permission before undertaking outside activities if official duties overlap in some way with the proposed activity, if it arises through work; or if it makes use of material to which employees have access by virtue of their position.

7.1 Paid Employment

No restriction shall be placed on employees undertaking other employment of a remunerative nature outside working hours, provided the additional employment does not interfere with or impair their ability for the efficient execution of their normal duties within WLHP. However, employees should not engage in work for any individual firm or body where WLHP has been, or could be involved in the transaction or other business, or where the work in any way impinges on WLHP's interests.

7.2 Use of Facilities

No paid outside work of any sort should be undertaken at the workplace, and no use should be made of office facilities in connection with such work. Employees should not encourage receipt of non-work related correspondence and incoming telephone calls. The prohibition also extends to unpaid or voluntary activity, unless employees have written permission from management.

7.3 Political, Campaigning and Public Activities

Employees must avoid any activity in the public arena, which could bring WLHP into disrepute. Employees must not allow personal or political opinions to interfere with their work or impartiality.

8. GIFTS AND HOSPITALITY

Employees must not accept any gift, favour or hospitality which is intended as, or might be deemed by others to have the effect of, an inducement.

Employees are required to adhere to guidelines in respect of the acceptance of gifts, rewards or hospitality when employed by WLHP. Detailed guidance is contained within WLHP's Policy on Gifts and Hospitality and acceptance/refusal must be recorded in the appropriate register.

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Employees attending any internal or external functions should conduct themselves appropriately and should not act in ways that could affect the reputation of the Wheatley Group.

9. CONTACT WITH THE MEDIA AND POLITICAL GROUPS

Employees must be aware that comments on issues, which are subject to debate, must be limited to professional advice, fact, legal and financial implications. All contact with the media and political groups should normally be directed through the Wheatley Group Communications department. Employees in any doubt should contact their manager.

Outwith their normal duties, no employee may publish any material or deliver any lecture or address relating specifically to WLHP, Wheatley Group or its business without prior approval. This approval should be requested in writing to the Group Chief Executive.

10. DECLARATION OF INTERESTS

10.1 General

Social landlords have a reputation for high standards of conduct and integrity. These standards are reinforced by legislation and the ethos of the sector, where honesty and openness are the guiding principles. Employees must ensure that private and personal interests do not influence decisions, and that they do not use their position to obtain personal gain of any sort, either directly or for their families, friends or associates. Employees must declare any actual or potential conflicts of interests that arise, affecting them, their close family, friends or associates (potential conflicts of interest are sometimes referred to as 'dualities of interest') in WLHP's Register of Interests. Employees must declare to management any financial or non-financial interests which could bring about conflict with WLHP's interests. In the case of married persons, persons living together as husband and wife/same sex partners or close relatives; the interest of one person shall be deemed to be an interest of the other and, therefore, will be subject to the provisions of WLHP's Code of Conduct.

10.2 Conduct in Meetings

If an employee has a direct or indirect financial interest in any contract or proposed contract or any other matter, which is subject of consideration, he/she shall disclose this fact and leave the meeting before any discussion or voting on that matter.

Any interests that are not financial, but which could influence judgement or give the impression that an employee may be acting for personal motives (such as kinship, friendship, member of an organisation or other relationship), should be disclosed in a similar way and the employee should leave the meeting before discussion on that matter.

WLHP maintains formal registers of the interests of Board Members and employees. Employees will be expected to sign an initial declaration for the register, and thereafter update it whenever a new interest arises. These registers will be kept separate and the register of Board Members' interests will normally be available for public inspection, except where there is a good reason for confidentiality.

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