



Code of Conduct

Author	Reviewing body	Approval date	Version number
Company Secretary	Board	9 December 2021	V3

1. Introduction

- 1.1 We want to uphold the highest standards of probity and conduct in everything that we do. The code of conduct, which is based on the National Housing Federation's 2012 model, supports us to do this by defining the actions and behaviours we expect of everyone involved in delivering our services.
- 1.2 Unless otherwise indicated, the code applies to Non-Executive Directors (NEDs), Executive Directors, staff, regularly and formally involved customers, volunteers and suppliers.
- 1.3 Should further advice be required; both the Head of Governance and Head of People can provide guidance in relation to the code.
- 1.4 Failure to comply with the code could result in a disciplinary matter or action being taken to discontinue the relationship with VIVID to protect VIVID and its reputation.
- 1.5 The code of conduct should be read in conjunction with the conflict of interest procedure and appendices.

2. General responsibilities

We'll fulfil our duties and obligations responsibly and in the best interests of VIVID and its customers. We'll do this by:

- 2.1 complying with the law, terms of appointment, contract of employment and VIVID's policies and procedures, as applicable;
- 2.2 being careful not to conduct ourselves in a manner which could bring VIVID into disrepute. This includes membership of, or participation in, activities organised by groups or organisations whose values are inconsistent with VIVID's or making derogatory comments about VIVID, its customers, partners or services, either verbally, in writing or via any web-based media (including but not limited to Facebook, Twitter and YouTube or personal blog). This also applies where VIVID isn't named or a pseudonym is used, but where its identity can reasonably be inferred;
- 2.3 never acting in a way that unjustifiably favours or discriminates against particular individuals, groups, or interests;
- 2.4 respecting the appropriate channels for handling tenancy and service provision issues and acting in accordance with VIVID's established procedures;
- 2.5 ensuring information acquired in the course of our duties isn't misused for private interests or interests of others;
- 2.6 respecting the principle of collective decision-making and corporate responsibility. This means supporting the decisions that the Board makes.

3. Conflict of interests

We'll take reasonable steps to make sure that no undeclared conflict arises, or could reasonably be perceived to arise, between our duties and our personal interests, financial or otherwise. We'll do this by:

- 3.1 complying with our conflict of interest procedure for declaring, recording, and handling conflicts of interest. It requires the declaration of any private interests which may, or may be perceived to, conflict with the duties of our position;

- 3.2 keeping VIVID's registers of interests complete, accurate and up to date;
- 3.3 not engaging in any political or campaigning activity that might compromise VIVID's position. VIVID won't prevent anyone from engaging in political activities in their own time, but where a potential conflict could arise, consideration will be given to what's needed to protect VIVID and its reputation;
- 3.4 completing a declaration of interest when taking up new employment or appointments (whether these are paid or unpaid). Any such work or position must not interfere or conflict with the interest of the position or VIVID;
- 3.5 completing a 'Prior approval for applicants with a connection to VIVID' form when making an application for housing;
- 3.6 not using, or attempting to use, our position to promote personal interests or those of any closely connected* person, business or other organisation.

NEDs, staff, regularly and formally involved customers and volunteers only

- 3.7 speaking to line management, the Head of Service or Executive before applying for 'public duty' which includes the following positions:
 - Magistrate;
 - Local councillor;
 - School governor / member of school council;
 - Member of any statutory tribunal;
 - Member of a health authority or the Environment Agency;
 - Member of the prison independent monitoring boards;
 - Trade union member (for trade union duties);
 - Board or trustee;
- 3.8 ensuring we're not involved in the appointment or decisions relating to discipline, promotion, pay or benefits for any member of staff to whom we are related or closely connected*. We'll declare any such relationship according to VIVIDs conflict of interest procedure;
- 3.9 ensuring we're not involved in the appointment, establishing terms of a contract, or ongoing monitoring and management of a contractor or supplier to whom we are related or have a close connection*. We'll declare any such relationship according to VIVID's conflict of interest procedure.

Staff, Executive Directors, NEDs and suppliers only

- 3.10 not using our contractors and suppliers for private purposes (where this is unavoidable, a favourable service shouldn't be received because of the connection with VIVID). See our conflict of interest procedure.

** Closely Connected includes but is not limited to spouses or partners; close relatives, close friends, neighbours or business associates.*

4. Bribery, gifts and hospitality

We won't offer, seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise our judgement or integrity (or put us under an obligation to those individuals or organisations). We'll do this by:

- 4.1 complying with the law and VIVID's policies and procedures in relation to:

- bribery and corruption (Prevention of financial crime policy); and
- the giving, receipt, approval and recording of gifts and hospitality (Gifts and hospitality procedure).

5. Funds and resources

We'll make sure VIVID's funds and resources aren't misused. We'll do this by:

- 5.1 ensuring that the organisational funds and resources entrusted to us are used efficiently, economically and effectively;
- 5.2 complying with the financial and procurement regulations, ensuring value for money and fairness in decision-making;
- 5.3 taking reasonable measures to protect VIVID's funds, resources, property and assets from theft, damage and misuse;
- 5.4 complying with the information systems security and acceptable use policy relating to the use of email, intranet and internet services. Amongst other things, this policy prohibits access to pornographic or racist material, and the use of unauthorised or unlicensed software;
- 5.5 only claiming reimbursement for expenditure that was properly and reasonably incurred in carrying out VIVID's business.

6. Confidentiality

We'll handle information in accordance with the law and VIVID's policies and procedures.

We'll do this by:

- 6.1 complying with the Data Protection Act 2018 and General Data Protection Regulation (GDPR) 2018 which govern the protection of personal data. All personal data held about customers and other service users, employees and others, whether on paper or electronically is subject to the provisions of the Act. VIVID's data protection policy and procedures give further guidance;
- 6.2 ensuring we don't, without prior authority:
 - disclose any confidential business information (this duty continues to apply after an individual has relinquished their position);
 - pass or distribute to the press, media, social media or any external recipient(s), information or materials relating to VIVID;
 - write media articles, blog posts or tweets about VIVID and its activities;
 - make comments or statements to the media. If approached enquiries must be passed to VIVID's Communications team;
 - misrepresent our own views as the views or position of VIVID;
- 6.4 ensuring we don't prevent another person from gaining access to information to which they are entitled by law.

7. Respect for others

We'll treat others with respect at all times. We'll do this by:

- 7.1 complying with the law and with VIVID's equality and diversity policy and guidance.
- 7.2 never harassing, bullying or attempting to intimidate any person;
- 7.3 ensuring we don't display materials in the workplace or use language which other people might reasonably find offensive.

8. Relationship between NEDs, staff and customers

We'll maintain constructive and professional relationships. We'll do this by:

NEDs only

- 8.1 maintaining a duty of loyalty and support towards VIVID reflected in a constructive, professional relationship with its staff;
- 8.2 never going beyond the NED position and becoming inappropriately involved in operational matters;
- 8.3 setting an example by demonstrating the highest standards of integrity, ethics and alignment with the values, policies, and objectives of VIVID when dealing with staff, formally and informally.

NEDs, regularly and formally involved customers and volunteers only

- 8.4 where necessary, raising issues of poor staff performance at a formal meeting, 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;
- 8.5 not appearing to undermine the authority of a senior officer in his or her dealings with a more junior member of staff;
- 8.6 avoiding inappropriate personal familiarity with members of staff or suppliers;
- 8.7 not asking or encouraging a member of staff to act in any way which would conflict with compliance with this code or VIVID's policies and procedures.

Regularly and formally involved customers and volunteers only

- 8.8 not instructing or directing a member of staff or supplier. The relevant manager or member of staff must convey all instructions.

Executive Directors and Staff members only

- 8.9 when working with the board, a committee or a customer's/service users committee or panel:
 - taking direction in accordance with their delegated authority;
 - responding constructively to questioning or challenge;
 - responding willingly to requests for information.
- 8.10 avoiding inappropriate personal familiarity with NEDs, regularly and formally involved customers, volunteers, and suppliers;
- 8.11 not knowingly misleading or coercing the board or any of VIVID's committees or panels. In presenting information, setting out the facts and relevant issues truthfully.

9. Relationship with customers and other service users

We'll always show professionalism, fairness and courtesy to our customers. We'll do this by:

- 9.1 treating customers and other service users with respect;
- 9.2 reporting any personal relationship with a customer or other service user where there is a conflict of interest in position or responsibilities. We'll declare any such relationship according to VIVIDs conflict of interest procedure;
- 9.3 not giving gifts or loans of money to, or receive loans or gifts of money from, customers or other service users;
- 9.4 taking care in handling customers' and other service users' money, ensuring that a receipt is completed and retained for every transaction. Cash should not be handled on behalf of VIVID unless this position is approved to do so and specifically requires it;
- 9.5 never 'borrowing' money from petty cash, rents, customer's deposits, donations, or other monies held on behalf of VIVID. Any such actions will be considered as theft and will be subject to disciplinary or legal action;
- 9.6 not inviting or influencing a customer or other service user to make a will or trust under which VIVID (or individuals connected with VIVID) are named as executor, trustee, or beneficiary;
- 9.7 complying with the law and VIVID's data protection policy and procedures when handling information relating to customers and other service users.

10. Health, Safety and Security

We'll ensure our conduct doesn't endanger the health, safety or security of those around us. We'll do this by:

- 10.1 complying with VIVID's health and safety policy (including wearing protective clothing where required) and bringing to the attention of the appropriate person any risks to ourselves or others;
- 10.2 proving identity by way of an ID badge when working on behalf of VIVID and cooperating with any request to verify our identity;
- 10.3 complying with the law and VIVIDs drug and alcohol procedure;
- 10.4 observing security practices at VIVID premises.

11. Conduct at meetings

We'll maintain high standards of integrity, commitment, and courtesy during meetings. We'll do this by:

- 11.1 being courteous to all other attendees and respectful of the position of the meeting chair. This includes, but is not limited to, good time keeping and sending timely apologies for non-attendance;
- 11.2 avoiding using threatening or aggressive behaviour or acting in a disruptive way;
- 11.3 sharing responsibility for board, committee, panel or working group decisions, even when not in agreement.

12. Representing VIVID

In representing VIVID at external events and in dealings with outside bodies, we'll uphold and promote our values, objectives, and policies. We'll do this by:

- 12.1 not becoming involved in, or being seen to endorse, any activity that may bring VIVID into disrepute. This includes but is not limited to illegal, immoral, racist, or other discriminatory activity;
- 12.2 demonstrating commitment to VIVID and support for its values, policies and goals when engaging in activities which promote the work of VIVID to the outside world;
- 12.3 dressing appropriately when representing VIVID at formal or informal events.
- 12.4 when working in or visiting customers' homes, behaving in a manner which avoids rudeness, excessive noise, over familiarity, argument and expressing an opinion about other service issues or other customers, parking vehicles in the wrong place and any derogatory or negative comments about VIVID. Also see Repairs Contractor Code of Conduct.

13. Learning and development

We'll take responsibility for our own learning and development, regularly updating and refreshing our skills and knowledge, with the help of VIVID. We'll do this by:

Staff, Executive Directors and NEDs only

- 13.1 playing an active part in VIVID's performance and development processes and welcoming constructive feedback;
- 13.2 at the appropriate induction, performance, and development meeting or regular 1-1 making personal training and development needs clear, so that they can be considered in VIVID's forward budgeting and planning;
- 13.3 attending all learning and development events that have been arranged (unless there are exceptional circumstances);
- 13.4 taking responsibility for keeping knowledge up to date in individual specialisms.

14. Reporting concerns

- 14.1 We facilitate reporting of reasonable and honest suspicions about possible wrongdoing through VIVIDs speak up policy. This includes potentially dishonest or fraudulent activity, material breaches of this code and anyone that believes they are being required to act in a way which conflicts with this code.
- 14.2 We won't tolerate the victimization of any person in relation to use of VIVID's confidential reporting procedures to report the misconduct, or alleged misconduct, of others.

15. Additional staff specific provisions

- 15.1 If a member of staff is convicted of a criminal offence whilst in employment, they are required to disclose the conviction to their manager. A risk assessment will be undertaken and VIVID will act accordingly

- 15.2 Where staff are provided with a uniform, it's their responsibility to keep it in a clean and tidy condition. The uniform will be replaced free of charge in the case of normal wear and tear but will be replaced at the employee's expense if damaged through negligence. VIVID recognises the diversity of cultures and religions of its employees and will take a sensitive approach when this affects dress and uniform requirements. However, priority will always be given to health and safety and other similar considerations.