



Code of Conduct

Author	Reviewing body	Approval date	Version number
Risk and Assurance Manager	Board	9 February 2023	1.0

1. Introduction

- 1.1. We want to uphold the highest standards of honesty and integrity in everything that we do. The code of conduct, which is based on the National Housing Federation's 2022 model, supports us to do this by defining the actions and behaviours we expect of everyone involved in delivering our services.
- 1.2. The Code is split into four main parts, each embodying a key theme. The four parts of the Code are:
 - **Acting in the best interests of VIVID and our residents:** you have a responsibility to carry out your role in line with our social purposes
 - **Behaving with integrity:** You must declare any potential conflicts of interests or relationships with residents as soon as possible, you must not use their position for any personal gain, take part in any acts of bribery, or disclose confidential information
 - **Conducting yourself professionally and treating others well:** You must promote cultures that are welcoming, accepting and accommodating towards people of all backgrounds, and must act professionally in all dealings with residents
 - **Protecting yourself, other people and the environment:** You must not knowingly put yourself or others at risk and must strive to avoid or reduce negative environmental impacts
- 1.3. Unless otherwise indicated, the code applies to Non-Executive Directors (NEDs), Executive Directors, staff, regularly and formally involved customers, volunteers and suppliers.
- 1.4. 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 our policies, procedures and employment contracts.
- 1.5. Both the Head of Governance and Head of People can provide further guidance in relation to the code should further advice be required.
- 1.6. Failure to comply with the code by employees, could damage our reputation and is consequently considered misconduct and could result in disciplinary action being taken.
- 1.7. The code should be read in conjunction with the conflict of interest procedure and appendices.

2. Acting in the best interests of VIVID and our residents

2.1. General Responsibilities

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

- 2.1.1. not conducting ourselves in a manner which could bring us into disrepute. This includes membership of, or participation in, activities organised by groups or organisations whose values are inconsistent with ours or making derogatory comments about us, our 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 we aren't named or a pseudonym is used, but where our identity can reasonably be inferred;

- 2.1.2. never acting in a way that unjustifiably favours or discriminates against particular individuals, groups, or interests;
- 2.1.3. respecting the appropriate channels for handling tenancy and service provision issues and acting in accordance with our established procedures;
- 2.1.4. ensuring information acquired in the course of our duties isn't misused for private interests or interests of others;
- 2.1.5. respecting the principle of collective decision-making and corporate responsibility. This means supporting the decisions that the Board and our committees make.

2.2. Representing VIVID

While 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:

- 2.2.1. not becoming involved in, or being seen to endorse, any activity that may bring us into disrepute. This includes but is not limited to illegal, immoral, racist, or other discriminatory activity;
- 2.2.2. demonstrating commitment and supporting our values, policies and goals when engaging in activities which promote our work to the outside world;
- 2.2.3. dressing appropriately when representing us at formal or informal events.
- 2.2.4. Behaving in an appropriate manner when visiting a customer's home. This includes avoiding rudeness, excessive noise, over familiarity, argument, expressing opinions about other service issues or other customers, parking vehicles in the wrong place and any derogatory or negative comments. It also includes avoiding expressing personal opinions about politics or religion. Also see Repairs Contractor Code of Conduct

3. Behaving with integrity

3.1. 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:

- 3.1.1. 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. Also see Guidance notes for staff who are customers
- 3.1.2. keeping our registers of interests complete, accurate and up to date;
- 3.1.3. not engaging in any political or campaigning activity that might compromise our position. We 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 us and our reputation;
- 3.1.4. 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 our interests
- 3.1.5. completing a 'Prior approval for applicants with a connection to VIVID' form when making an application for housing;

3.1.6. 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

3.1.7. 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;

3.1.8. 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 our conflict of interest procedure;

3.1.9. 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 our conflict of interest procedure.

Staff, Executive Directors, NEDs and suppliers only

3.1.10. 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 us). 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.*

3.2. 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:

3.2.1. complying with our 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).

3.3. Funds and Resources

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

3.3.1. ensuring that the organisational funds and resources entrusted to us are used efficiently, economically and effectively;

- 3.3.2. complying with the financial and procurement regulations, ensuring value for money and fairness in decision-making;
- 3.3.3. taking reasonable measures to protect our funds, resources, property and assets from theft, damage and misuse;
- 3.3.4. 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, racist or homophobic material, and the use of unauthorised or unlicensed software;
- 3.3.5. only claiming reimbursement for expenditure that was properly and reasonably incurred in carrying out our business.

3.4. Confidentiality

We'll handle information in accordance with the law and our policies and procedures. We'll do this by:

- 3.4.1. 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. Our data protection policy and procedures give further guidance;
- 3.4.2. 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 us
 - write media articles, blog posts or tweets about us and our activities;
 - make comments or statements to the media. If approached enquiries must be passed to our Communications team;
 - misrepresent our own views as the views or position of VIVID;
- 3.4.3. ensuring we don't prevent another person from gaining access to information to which they are entitled by law.

3.5. Reporting Concerns

- 3.5.1. We facilitate reporting of reasonable and honest suspicions about possible wrongdoing through our '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.
- 3.5.2. We won't tolerate the victimization of any person in relation to use of our confidential reporting procedures to report the misconduct, or alleged misconduct, of others.

4. Conducting yourself professionally and treating others well

4.1. Respect for others

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

- 4.1.1. complying with our equality and diversity policy and guidance.

- 4.1.2. never harassing, bullying or attempting to intimidate any person;
- 4.1.3. ensuring we don't display materials in the workplace or use language which other people might reasonably find offensive.

4.2. Relationships between NEDs, staff and customers

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

NEDs only

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

NEDs, regularly and formally involved customers and volunteers only

- 4.2.4. 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;
- 4.2.5. not appearing to undermine the authority of a senior officer in his or her dealings with a more junior member of staff;
- 4.2.6. avoiding inappropriate personal familiarity with members of staff or suppliers;
- 4.2.7. not asking or encouraging a member of staff to act in any way which would conflict with compliance with this code or our policies and procedures.

Regularly and formally involved customers and volunteers only

- 4.2.8. 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

- 4.2.9. 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.
- 4.2.10. avoiding inappropriate personal familiarity with NEDs, regularly and formally involved customers, volunteers, and suppliers;
- 4.2.11. not knowingly misleading or coercing the board or any of our committees or panels when presenting information, setting out the facts and relevant issues truthfully.

4.3. Relationship with customers and other service users

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

- 4.3.1. treating customers and other service users with respect;
- 4.3.2. 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 our conflict of interest procedure;
- 4.3.3. not giving gifts or loans of money to, or receive loans or gifts of money from, customers or other service users;
- 4.3.4. 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 our behalf unless this position is approved to do so and specifically requires it;
- 4.3.5. never 'borrowing' money from petty cash, rents, customer's deposits, donations, or other monies held on our behalf. Any such actions will be considered as theft and will be subject to disciplinary or legal action;
- 4.3.6. not inviting or influencing a customer or other service user to make a will or trust under which we (or individuals connected with us) are named as executor, trustee, or beneficiary;
- 4.3.7. complying with the law and our data protection policy and procedures when handling information relating to customers and other service users.

4.4. Conduct at meetings

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

- 4.4.1. 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;
- 4.4.2. not using threatening or aggressive behaviour or acting in a disruptive way;
- 4.4.3. sharing responsibility for board, committee, panel or working group decisions, even when not in agreement.

4.5. Learning and development

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

Staff, Executive Directors and NEDs only

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

5. Protecting yourself, other people and the environment

5.1. 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:

- 5.1.1. complying with our 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;
- 5.1.2. wearing our ID badge when working and cooperating with any request to verify your identity;
- 5.1.3. complying with our drug and alcohol procedure;
- 5.1.4. observing security practices at our premises.

5.2. Protecting the environment

We'll strive to avoid or reduce possible negative environmental impacts. We'll do this by:

- 5.2.1. considering the environmental impact of all decisions and where possible, seek to achieve positive environmental outcomes.

5.3. Additional staff specific provisions

- 5.3.1. If you're convicted of a criminal offence whilst in employment, including gaining points on your driving license, you're required to disclose the conviction to your manager. A risk assessment will be undertaken and we'll will act accordingly
- 5.3.2. If you're provided with a uniform, it's your 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 your expense if damaged through negligence. We recognise the diversity of cultures and religions of our 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.