

Employee Code of Conduct Policy

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

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SECTION A - INTRODUCTION

The Wheatley Group of companies receive substantial public funds and are obliged to demonstrate to customers and the public that we observe the highest standards of conduct from all employees who work for organisations that are part of the Wheatley Group. 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 the Wheatley Group. This code does not affect individual's rights and responsibilities under law.

All employees of CUBE 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 CUBE's confidentiality or trust, he/she should discuss the matter with his/her immediate line manager or with Employee Relations.

Please note: This policy does not form part of the employee's contract of employment with CUBE. This policy may be amended at any time in consultation with our recognised Trade Unions.

SECTION B - 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 the best interests of Wheatley Group.
- **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 in Wheatley Group.

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- **Objectivity:** any decisions, which employees take in the course of their work on behalf of any of the organisations in the Wheatley Group, including making appointments, awarding contracts, or recommending individuals for rewards or benefits, must be based solely on merit.
- **Accountability:** employees must accept accountability for their decisions and actions and be accountable to Wheatley Group.
- **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 Wheatley Group or by the law.
- **Honesty:** employees have a duty to declare any private interests, which might affect their work with Wheatley Group.
- **Leadership:** if they are in a managerial position, employees should support and promote these principles by their leadership and example.

SECTION C - GENERAL STANDARDS

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 CUBE'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.

Financial Conduct

Employees must ensure that all funds and resources entrusted on behalf of CUBE 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 for money for Wheatley Group, its tenants and other customers and any public or charitable funds. Employees should be aware of, and comply with, CUBE's financial policies and internal controls.

It is a serious criminal and disciplinary offence to corruptly receive or give any gift, loan, fee, reward or other advantage in return for doing (or not doing) anything, or showing favour (or

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disfavour), to any person or organisation. CUBE maintains a register for acceptance and refusal of hospitality and gifts and all must be recorded. Detail may be found in Wheatley Group's Policy on Gifts and Hospitality.

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

Ethical Standards

Employees of CUBE 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;

Confidential Reporting (Whistleblowing)

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

SECTION D - RELATIONSHIPS

Each employee needs to achieve and maintain effective professional and working relationships with colleagues, Board Members and external contacts, including CUBE's 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, as set out in CUBE's Code of Conduct for 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 CUBE's Grievance Policy.

Board

Employees are responsible to CUBE's Board, through the line management structure to the Group Chief Executive. Mutual respect between employees and 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.

Tenants and Other Customers of the Group

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.

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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.

Potential Tenants and Other Customers of the Group

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 CUBE must comply fully with any relevant regulatory requirements.

SECTION E - BALANCING OPENNESS AND CONFIDENTIALITY

The Wheatley Group wishes to act in an open and accountable way in relation to tenants, customers' local communities, local authorities and other interested parties. As a general rule, information about the Wheatley Group'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 the Wheatley Group's services) have a right to confidentiality, and this must be respected. The Wheatley Group has clear policies on Data Protection guidelines and disclosure of information.

The appearance of impropriety can be highly damaging to both employees and the Wheatley Group. It is vital that all tendering and purchasing decisions are made on an objective basis and in accordance with any regulatory requirements.

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. The Wheatley Group 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, 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 the Wheatley Group, particularly where alternatives exist. This may not always be possible or practical. If an employee uses Wheatley Group suppliers or contractors for personal services, he/she must achieve a separation between his/her personal purchasing decisions and those of the Wheatley Group. 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 Group Chief Executive.

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

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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.

Confidentiality

Employees should be aware of the types of information that must be kept confidential. Personal information about the Wheatley Group'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.

Employees should not use any information obtained in the course of their employment or 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 Wheatley Group's Policy on Data Protection.

SECTION F - 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 CUBE's Employment References Policy.

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

SECTION G - OUTSIDE ACTIVITIES

Activities outside of the work place are employees' own private business, but in some circumstances, could overlap or conflict with the Wheatley Group'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.

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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 the Wheatley Group. However, employees should not engage in work for any individual firm or body where the Wheatley Group has been, or could be involved in the transaction or other business, or where the work in any way impinges on the Wheatley Group's interests.

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. Clarification can be sought from Wheatley Group's Acceptable Use Policy.

Political, Campaigning and Public Activities

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

SECTION H - 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 CUBE. Detailed guidance is contained within Wheatley Group's Policy on Gifts and Hospitality and acceptance/refusal must be recorded in the appropriate register.

Employee 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.

SECTION I - 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 Communications department. Employees in any doubt should contact their manager.

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

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SECTION J - DECLARATION OF INTERESTS

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, directly or for their families, friends or associates. All employees must comply with this policy on Staff Conflicts of Interest.

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 Wheatley Group's Register of Interests. Employees must declare to management any financial or non-financial interests which could bring about conflict with the Wheatley Group'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 the CUBE's Code of Conduct.

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.

CUBE 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.
