



**PEAKS & PLAINS**  
Housing Trust

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# The Trust

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Board & Committee  
Member  
Code of Conduct

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Version number: V5a

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Effective Date:  
June 2023

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## 1. INTRODUCTION

- 1.1. This Code of Conduct provides a framework to help you to make decisions and is a guide to inform how you should act and behave as you carry out your duties and deal with colleagues, customers and partner organisations alike.
- 1.2. The Code aims to support a culture which enables and supports individuals to meet their responsibilities and deliver the best possible service to customers and the Trust to maintain a good reputation.
- 1.3. The Code does not aim to cover every situation in which Board and Committee members may find themselves as they perform their roles and we expect you apply good judgement, even where the Code does not contain specific requirements.
- 1.4. You have a responsibility to discharge your role in line with the purposes and values of the Trust and to consider these when you make decisions or take action. It is important to consider what impact any action or decision may have upon customers and the Trust's reputation. Our values are:

*We are one team with one goal*

*We are open and honest with each other so that we can work together to make things better for our customers and the Trust. We do not work in silos.*

*We are solution focused*

*We come up with ideas and find answers and efficiencies wherever we can. When we mess up we say sorry, learn from it, fix it and crack on. We act and keep things moving.*

*We are customer focused but business minded*

*We take pride in our homes and our work and we give our customers the service and value for money we'd expect ourselves. We always try to do more with less.*

*We are reliable and do the right thing*

*Even when no-one is looking and we speak up if something doesn't feel right – even when that means a tricky conversation. We don't leave loose ends or unfinished work for someone else to sort out.*

*We are respectful and celebrate our differences*

*We are fair and we respect our differences so that we all thrive and feel at home – at work.*

- 1.5. You should:
  - read the whole document carefully.
  - sign the final page and return it to the Governance Manager (Company Secretary).

(You may be required to complete a short e-learning course from time to time to confirm your understanding of the Code of Conduct).

- 1.6. This Code applies to all PPHT Board members, all subsidiary board members and all Committee members (including co-optees).
- 1.7. This Code is closely aligned with the National Housing Federation's (NHF) Code of Conduct 2022, a copy of this is available in the Convene Document Library.

## **ACTING IN THE BEST INTERESTS OF THE TRUST**

### **2. MEETING YOUR RESPONSIBILITIES**

#### **Main Principle**

You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of the Trust and for the delivery of its strategic objectives.

- 2.1. You must always try to fulfil the requirements of your role, to the best of your ability. If any circumstances arise that limit your ability to meet your responsibilities, you must raise this through the appropriate channels.
- 2.2. You must comply with the law, your terms of appointment and the relevant Trust policies and procedures.
- 2.3. In carrying out your role, you must always seek to further the Trust's strategic objectives, reflecting the Trust's values and desired culture.
- 2.4. You must not act in a way that discriminates against, or unjustifiably favours particular individuals, groups or interests, including on the basis of any protected characteristics they may have.
- 2.5. You must consider the impact of your actions on the safety and well-being of residents and of Trust employees.
- 2.6. You must respect the principle of collective decision-making and corporate responsibility. This means that once the Board, a Committee or the Executive Management Team (EMT) has made a decision you must support that decision in a positive way.
- 2.7. You must ensure that you declare to the Trust any relevant personal relationships, employment and other appointments you hold and that these do not interfere with your ability to perform or conflict with your role as a board member.
- 2.8. If you have a concern about possible wrongdoing, you must report it; the Trust's Whistleblowing Policy gives further guidance about this and how you should report it.
- 2.9. You must not misuse your position, for example, by using information acquired during the course of your duties for your private interests or those of others.

- 2.10. You must not engage in any political or campaigning activity that might compromise the position of the Trust. If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect the Trust, you must discuss the matter with the Chair and the Company Secretary (the Governance Manager) and obtain prior consent. Such consent must not be unreasonably withheld unless your activity poses a material risk to the association.
- 2.11. Before undertaking another board or committee member position at another organisation, you must seek the Chair's approval; this will not unreasonably be withheld. If you take up new employment or appointments during your term of office on the Board and/or Committee, you must make any necessary declaration of interest. Any such work or position must not cause a conflict of interest or interfere with your role as a Board and/or Committee member.
- 2.12. If you apply for a job with the Trust, you must step down from the Board.

### 3. REPRESENTING THE TRUST

#### **Main Principle**

In representing the Trust in any capacity, including at external events, in dealings with outside bodies and on social media, you are an ambassador for the Trust and must uphold and promote our values, purpose, objectives and policies.

- 3.1. In representing the Trust, you must act in accordance with its values, policies and goals.
- 3.2. You must not bring the Trust's name into disrepute or affect our integrity by your behaviour. You must not become involved in, or be seen to endorse, any activity that may bring the Trust into disrepute, this includes membership of, or participation in, activities organised by groups or organisations whose values are inconsistent with the Trust's values (for instance, racist organisations) and/or which could create reasonable doubt in your ability to comply with our values.
- 3.3. You must not make derogatory, false or otherwise damaging comments, in person or through any medium (including Twitter, Facebook, YouTube and others) about the Trust or any person, service or organisation connected with it nor misrepresent the views or position of the Trust. This also applies if you do not name the Trust but where anyone might recognise that your comments are about the Trust; similarly, if you use a fake name but your identity can reasonably be inferred.
- 3.4. You must not seek to officially represent the views or position of the Trust without prior authority (this includes writing letters about Trust business to 3rd parties such as local MPs, councillors, governing bodies, partner organisations etc.). If you are approached for comments or statements to the media, you must pass the enquiry to our Communications Manager.
- 3.5. You must adhere to the Trust's policies in the use of email, intranet and internet services including social media.

- 3.6. When representing the Trust through any medium, including social media, you must at all times act with professionalism.
- 3.7. Where any personal social media accounts refer to your role within the Trust, you must make it clear in what capacity you are communicating.

## **BEHAVING WITH INTEGRITY**

### **4. CONFLICTS OF INTEREST**

#### **Main principle**

You must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between your duties to the Trust and your personal interests, other duties and relationships, financial or otherwise.

- 4.1. You must formally declare to the Trust, at the earliest opportunity, any interests which may, or be perceived to or may in the future, conflict with the duties of your role and you must comply with our procedures for declaring, recording and handling conflicts of interest.
- 4.2. You must declare any known relationship to a person applying for or performing a role within the Trust and must not be involved with their appointment, performance management or reward.
- 4.3. You must declare any known relationship to a resident, potential resident or other customer of the Trust. You must not be involved in decisions relating to their relationship with the Trust, or seek or accept preferential treatment for them.
- 4.4. You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to the Trust and must not be involved in their appointment, performance management or reward.
- 4.5. Except where specifically permitted, as set out in the Trust's relevant policy, you must avoid using its contractors or suppliers for private purposes.
- 4.6. You must not use, or attempt to use, your position to promote personal interests or those of any connected person, business or other organisation for personal gain.
- 4.7. Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or longstanding, and in the opinion of the Board cannot be managed appropriately.

### **5. BRIBERY, GIFTS AND HOSPITALITY**

#### **Main principle**

In your role with the Trust, you must not offer, seek or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts or 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. You must not seek or accept preferential treatment in the provision of benefits such as housing accommodation or employment.

- 5.1. You must not solicit or seek gifts or hospitality or other benefits.
- 5.2. You must comply with the Law and with the Trust's policies and procedures in relation to bribery and corruption and gifts and hospitality. You must familiarise yourself with the Trust's Anti-fraud and Corruption and Money Laundering policies.
- 5.3. Any gifts or hospitality offered to or by you should either be declared or declined according to the Trust's policies. Gifts of cash should not be accepted under any circumstances. You must notify the Governance Manager (Company Secretary) about any gifts or hospitality offered, received or declined to enable them to be recorded as soon as practicable in the Gifts and Hospitality Register.
- 5.4. If you are offered a bribe, hospitality or a gift which is or may be in return for expected preferential treatment, you must decline and declare this immediately to the appropriate person.

## 6. FUNDS, RESOURCES AND PERSONAL BENEFITS

### **Main principle**

You must not misuse the Trust's funds or resources or seek preferential treatment for your own personal benefit.

- 6.1. You must comply with our policies and procedures regarding the use of our resources. 'Resources' includes staff, information, telephone, computer and other IT facilities, equipment, stationery, materials and transport.
- 6.2. You must ensure that the Trust's funds and resources are used properly and efficiently.
- 6.3. You must comply with our policies and procedures and the law regarding procurement, ensuring value for money and fairness in decision-making.
- 6.4. You must take reasonable measures to protect the Trust's funds, resources, property and assets from fraud, theft, damage and misuse.
- 6.5. You must comply with our policy and procedures relating to the acceptable or unacceptable use of e-mail, intranet and internet services.
- 6.6. You must not involve your personal money with Trust funds. If you do you must notify the Director of Resources at the earliest possible occasion.
- 6.7. If you claim any reimbursement for any expenses you must do so in line with the Trust's policies & procedures. You must claim reimbursement only for expenditure if it was properly and reasonably incurred in carrying out Trust's business and whatever you do claim must be accurate.

## 7. CONFIDENTIALITY

### **Main principle**

You must process information in accordance with the Law and the Trust's policies and procedures.

- 7.1. You must comply with the Data Protection Act 2018, which governs the protection of personal data and with the Trust's Data Protection Policy and Information and Security policy.
- 7.2. You must not disclose, without the required permission and authority, any personal data about tenants, customers, staff or colleagues.
- 7.3. You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left the Trust or stepped down from your position.
- 7.4. You must not, without authority, pass or distribute to the press or media or any other external recipient(s) any unpublished information or materials relating to the Trust, unless you are doing so in accordance with the Trust's whistleblowing policy and procedure.
- 7.5. You must not prevent another person from gaining access to information to which they are entitled by law.

## 8. REPORTING CONCERNS

### **Main principle**

You must report to the appropriate person within the Trust any reasonable suspicions you have about possible wrongdoing in line with your Trust's relevant policies and procedures. The Whistleblowing Policy gives further guidance.

- 8.1. If you have a concern about possible wrongdoing, you must immediately report it by the appropriate internal channel or external body. This includes becoming aware of potentially fraudulent activity, and material breaches of this code or relevant legislation including health and safety.
- 8.2. If you believe you are being required to act in a way which conflicts with this code or legislation, you must immediately report it via the appropriate channel.
- 8.3. You must not victimise or disadvantage any person who uses or intends to use the Trust's confidential reporting (whistleblowing) procedures to report actual or alleged wrongdoing.



## CONDUCTING YOURSELF PROFESSIONALLY AND TREATING OTHERS WELL

### 9. RESPECT FOR OTHERS

#### **Main principle**

You must treat all others with respect and consideration.

- 9.1. You must treat everyone you meet in the performance of your role with equal respect, care and consideration.
- 9.2. You must show respect for individuals' chosen identities.
- 9.3. You must promote, through your behaviours, an organisational culture that is welcoming, accepting and accommodating to people of all backgrounds, cultures, and personal and protected characteristics.
- 9.4. You must comply with the law and the Trust's policies relating to Equality, Diversity and Inclusion.
- 9.5. You must not harass, bully or attempt to intimidate any person, or use threatening or aggressive behaviour or other discriminatory behaviours.
- 9.6. You must not display materials in your workplace, or use language in the performance of your role which other people might reasonably find offensive.
- 9.7. You must report through appropriate channels any instances of unfair or unequal treatment in the workplace and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and respecting confidentiality
- 9.8. You must comply with the Trust's EDI Policy and other policies as they relate to your role.

### 10. RELATIONSHIP BETWEEN BOARD MEMBERS, STAFF, INVOLVED RESIDENTS AND OTHER CUSTOMERS

#### **Main principle**

Board members, staff and involved residents must maintain fair, courteous, constructive, professional relationships with each other, based on a sound understanding of their respective roles.

- 10.1. Your relationships with staff and involved tenants must be constructive and professional.
- 10.2. In your dealings with employees, formally and informally, you must set an example by demonstrating the highest standards of integrity and ethics and your behaviour and actions should reflect the Trust's values, policies and objectives.
- 10.3. You must not ask or encourage the commitment of wrongdoing, including any breach of this code.

- 10.4. You must not go beyond your role as a Board member and become inappropriately involved in operational matters. You must respect the appropriate channels for handling tenancy and service provision issues.
- 10.5. Where it is necessary to raise issues of staff, board and contractor performance, these must be raised constructively and through the appropriate channels. Any concerns about the performance or conduct of employees must be discussed in confidence with the Chair of the Board or with the Chief Executive. This must be done in a constructive and positive way so that we can put things right in the future.
- 10.6. You must not undermine or appear to undermine the authority of a senior manager in his or her dealings with a more junior member of staff
- 10.7. You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with members of staff.
- 10.8. Unless you have specific and, where practicable, written delegated authority to do so, you must not individually give instruction or direction to any member of staff or contractor.
- 10.9. You must not invite or influence a customer or other customer, unless they are a person who you are closely connected to, to make a will or trust under which you are named as executor, trustee or beneficiary.
- 10.10. You must avoid inappropriate personal familiarity with employees.
- 10.11. You must not ask or encourage an employee to act in any way which would conflict with compliance with this Code or the Trust's policies and procedures.
- 10.12. You must declare any personal relationship with other Trust employees, Board or Committee members or involved residents so that any potential conflicts of interests can be identified. (See Conflicts of Interest section).
- 10.13. You must not allow any personal relationship with a customer or other stakeholder to conflict with your role and responsibilities.
- 10.14. You must not allow yourself to be compromised by, nor take advantage of, relationships with customers or other stakeholders. The relationship of trust must never be abused.
- 10.15. You must not gift or loan money to, or receive gifts or loans of money from, customers or other stakeholders.
- 10.16. You must take great care in handling customers' and other stakeholders' money and remember to give a receipt for every transaction.
- 10.17. When handling information relating to customers or other stakeholders, you must comply with the law and the Trust's Data Protection and Information Security policies relating to the protection of personal data.

## PROTECTING YOURSELF, OTHER PEOPLE AND THE ENVIRONMENT

### 11. HEALTH, SAFETY AND SECURITY

#### **Main principle**

Your conduct, actions and decision making must not endanger the health, safety, security or wellbeing of yourself or others.

- 11.1. You must comply with the Trust's health and safety policies and procedures and bring to the attention of Executive Director of Resources or the Health & Safety Manager any risks to yourself or others. Where you are provided with protective clothing this must be worn.
- 11.2. You must not knowingly put your own or others' health, safety, security or well-being, unnecessarily at risk.
- 11.3. If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or group of individual connected with the Trust, you must report this immediately through the appropriate channels.

### 12. LEARNING AND DEVELOPMENT

#### **Main principle**

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

- 12.1. You must keep your knowledge up to date in those areas in which you are a specialist, as well as keeping abreast of any matters relating to your Trust and the wider housing sector.
- 12.2. You must play an active part in the Trust's performance appraisal processes as they applying to you, offering open and constructive feedback about your own performance.
- 12.3. You must make your personal training and development needs relevant to your role known to the Trust so that they can be taken into account in the Trust budgeting and planning.
- 12.4. Unless there are exceptional reasons, you must attend learning and development events, as required.

### 13. PROTECTING THE ENVIRONMENT

#### **Main principle**

Within your role at the Trust, you must strive to avoid or reduce possible negative environmental impacts.

- 13.1. In carrying out actions or making decisions in the performance of your role, you must consider the environmental impact of your decisions and where you are able, seek to achieve positive environmental outcomes.

13.2. You should consider the long term environmental impact of your decisions.

#### 14. CONDUCT AT MEETINGS

##### Main principle

Your conduct at meetings must be respectful and reflect our values and behaviours. Above all:

- Be on time and read any relevant information beforehand.
- Be courteous to all other attendees, and respect the position of the Chair.
- Don't be unnecessarily distracted by technology (e.g. taking calls or reading text messages)
- Don't use threatening or aggressive behaviour, or act in a disruptive way.
- Do not attend meetings while intoxicated or under the influence of drugs.

#### 15. FAILURE TO FOLLOW THIS CODE OF CONDUCT

15.1. If you do not follow this Code of Conduct you will be putting the Trust and its work at risk. Any breaches of the Code will be dealt with in line with the Board & Committee Member suspension and removal process and may result in your removal from the Board or Committee.

#### 16. ASSOCIATED DOCUMENTS

- 16.1.
- Procurement Policy
  - Procurement Strategy
  - Email & Intranet Policy
  - Board Expenses Policy
  - Information Security Policy
  - Data Protection Policy
  - Equality, Diversity & Inclusion Policy
  - Health & Safety Policy and Health & Safety management system
  - Anti-Fraud & Corruption Policy
  - Anti-Money Laundering Policy
  - Whistleblowing Policy
  - Board Member Agreement for Services
  - NHF – Code of Conduct 2022

Signed:..... Print Name:..... Date:.....

Document Name:	Board & Committee Member Code of Conduct
Approved by:	Governance Committee
Drafted By:	Governance Manager
Date approved:	6 <sup>th</sup> June 2023
Next Review Date:	June 2026