



Employee Code of Conduct

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1.0 Introduction

1.1 Tenants, Board members, and all stakeholders are entitled to expect the highest standards of conduct from Livin's employees. This Code of Conduct sets out the minimum standards of conduct and behaviour expected of employees and underpins the delivery of Livin's business strategy, Plan A.

1.2 All employees are required to follow this Code as part of their contract of employment. In the unlikely event of a disparity between the contract of employment and this Code, the terms and conditions of employment as set out in the contract of employment have primacy.

1.3 Integrity is central to this Code. Employees must comply with the Probity Policy in declaring personal interests and ensuring that there is no conflict between these and the interests of Livin and declaring all gifts and hospitality offered, whether accepted, donated or declined.

1.4 The Code cannot cover all eventualities and employees will need to apply sound judgement in line with Livin's values and the spirit of this Code where it does not contain specific requirements, considering how their conduct and behaviours will impact upon tenants and Livin's reputation. If an employee requires further information on any aspect of this Code they should contact People Services.

2.0 Scope

2.1 This Code applies to all employees of Livin and its subsidiaries, and to key third parties delivering services on behalf of Livin. It will be made available to all those it covers, and all employees and other relevant parties will have access to the Code and to all supporting policies and procedures via the intranet and other appropriate means. The Code also covers employee induction and periodic refresher training as required.

3.0 National Standards

3.1 While housing associations are not public bodies, all employees in the sector should uphold the Seven Principles of Public Life: selflessness, integrity, objectivity, accountability, openness, honesty, and leadership.

3.2 Livin complies with national standards for governance set out by The Good Governance Standards for Public Services (OPM and CIPFA, 2004) and its adopted code of governance the National Housing Federation (NHF)'s Code of Governance 2020.

3.3 Livin has adopted the NHF's Code of Conduct 2022. The NHF's Code has been adapted as set out within this local Code to reflect Livin's circumstances and is reflected as appropriate within all other relevant policies and documents within the Governance Pack, particularly the Board Code of Conduct.

3.4 This Code complies with all other legislation and regulations applicable to the conduct of employees, including the Bribery Act 2010. The Code aligns where relevant with the Chartered Institute of Housing's Professional Standards.

4.0 Livin's Vision and Values

4.1 Livin's vision is to improve lives through sustainable homes and places. In pursuit of this vision, Plan A sets out a number of ambitious objectives and priority areas of focus, with the primary focus on supporting sustainable places.

4.2 Livin's values are trust, respect, innovate and working together. The values drive how Plan A is delivered and expectations in relation their application are set out within this Code and the supporting Behaviour, Attitudes and Values framework that is used within employee performance Check-Ins.

5.0 Employee Code of Conduct

Acting in the best interests of Livin and its tenants

Contractual duties and obligations

5.1 Employees must fulfil their duties and obligations responsibly, acting at all times in good faith, in the best interests of Livin and in line with its values and policies.

5.2 In carrying out their roles, employees must deliver and always seek to further Livin's strategic objectives, reflecting its desired culture.

5.3 Employees 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.

5.4 Employees must always consider the impact of their actions on the safety and wellbeing of tenants and other customers.

5.5 Employees must always try to fulfil the requirements of their role to the best of their ability. If any circumstances arise that limit an employee's ability to meet their responsibilities, they must raise this with their line manager.

Private work

5.6 Employees must not undertake private work (paid or unpaid) outside of their contracted working hours that may interfere with their role within Livin, cause an actual or potential conflict of interest, makes use of information, resources or contacts to which the employee has access by virtue of their role with Livin, or otherwise conflicts with terms set out in their contract of employment. No employee shall work in any capacity for any contractor, supplier, or client of Livin.

5.7 Employees at and below Band 6 may be permitted to undertake private work, provided there is no impact on their role within Livin, no conflicts are identified, and the additional working hours are not

within the employee's contracted working hours and do not breach the Working Time Regulations. Employees at or above Band 7 will not typically be permitted to undertake private work, and only in exceptional circumstances will requests from employees at this level be approved.

5.8 Employees must formally request permission from senior management via the HR system prior to commencing any private work, with decisions to be made by the relevant Executive and the Executive Director of Corporate Services, or in the case of Executives, the Chief Executive directly. Senior management will approve, conditionally approve or refuse an employee's request, again via the HR system.

5.9 Employees must notify senior management if there are any increases in the scope or volume of private work undertaken at any time following an approval or conditional approval. If senior management identifies that the duties associated with an employee's private work subsequently compromise the ability of the employee to undertake their contractual hour or duties with Livin, then approval to undertake the private work will be withdrawn.

Public duties

5.10 Employees undertaking public duties as defined within the Annual Leave, Flexi and Special Leave Procedure (e.g., school governor or magistrate) are not constrained by the clauses relating to private work, but again must formally request permission via the HR system prior to accepting such duties.

Representing Livin

5.11 Employees' dress and general appearance should be consistent with the image which Livin seeks to project and be appropriate to the occasion, as set out in the Dress Code. Employees must wear photo ID badges at all times when dealing with the public and/or representing Livin externally.

5.12 In representing Livin in any capacity, including at external events, in dealings with outside bodies and on social media,

employees act as ambassadors for Livin and must at all times uphold and promote its values, strategic objectives and policies.

5.13 Employees must not conduct themselves in a manner that could reasonably be regarded as bringing Livin into disrepute. They must not make derogatory, false or otherwise damaging comments, in person or through any medium, about Livin or any person, service or organisation connected with it.

5.14 Employees must not seek to officially represent the views or position of Livin without prior authority. When representing Livin through any medium, including social media, employees must at all times act with professionalism.

5.15 Employees must adhere to Livin's policies in the use of email, intranet and internet services including social media. Where any personal social media accounts refer to an employee's role with Livin, they must make it clear in what capacity they are communicating.

5.16 Employees must in the course of their duties act in an impartial and politically neutral manner. If, outside of work, employees intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect Livin, they must obtain prior consent from senior management. Such consent will not be unreasonably withheld unless the employee's activity poses a material conflict of interest and/or risk to Livin.

Behaving with integrity

5.17 The reputation and good name of Livin depends on compliance with this Code, and with the laws, policies and procedures that it refers to. The integrity of employees needs to be beyond doubt, and seen so to be. All employees must comply with the Probity Policy.

Conflicts of interests

5.18 Employees must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between

their duties to Livin and their personal interests, other duties and relationships.

5.19 Employees must formally declare to Livin, at the earliest opportunity, any interests which may, or may be perceived to or may in the future, conflict with the duties of their role.

5.20 Employees must declare any relationship to a person applying for or performing a role within Livin that they could reasonably be expected to know about, and must not be involved in their appointment, performance management or reward.

5.21 Employees must declare any known relationship to a tenant, potential tenant or other customer of Livin that they could reasonably be expected to know about. Employees must not be involved in decisions relating to their relationship with Livin (e.g., the allocation of housing), or seek or accept preferential treatment for them.

5.22 Employees must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to Livin, that they could reasonably be expected to know about, and must not be involved in their appointment, performance management or reward.

5.23 Except where specifically permitted, as set out in the Probity Policy, employees must avoid using its contractors and suppliers for private purposes.

5.24 Employees must not use, or attempt to use, their position to promote their personal interests or those of any connected person, business or other organisation for personal gain.

Bribery, gifts and hospitality

5.25 It is a criminal, as well as a disciplinary offence, for an employee to participate in any form of bribery, whether passive, active, or

failing to prevent bribery. All employees must comply with the Anti-Bribery Policy.

5.26 Employees must not offer, seek or accept bribes or inducements to act improperly or corruptly. They must not solicit or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise their judgement or integrity or place them under any obligation to those individuals or organisations. They must not seek or accept preferential treatment in the provision of benefits such as housing or employment.

5.27 Any gifts or hospitality offered to or by employees must be declared, and either accepted, declined or donated in line with the Probity Policy.

5.28 If employees are offered a bribe, hospitality or a gift, which is or may be in return for expected preferential treatment, they must decline and declare this immediately to their line manager.

Sponsorship

5.29 If contacted directly by an external organisation seeking to sponsor Livin in any way, employees must pass enquiries to or otherwise notify the Executive Lead – Transformation.

5.30 No event or organisation can be sponsored by Livin without the prior permission of the Chief Executive. Where Livin seeks to sponsor an event or organisation, the relevant member of EMT will ensure the sponsorship complies with the requirements of the Probity Policy.

Criminal offences

5.31 There may be circumstances when conduct outside work, for example, conviction for a criminal offence, may result in disciplinary action being taken against the employee. Each incident will be considered on a case-by-case basis.

5.32 Employees requiring a Disclosure and Barring Service check as a pre-condition for employment are required to notify People Services at the earliest possible opportunity if they receive a caution or conviction, are required to attend court following an incident that may lead to a criminal conviction, or are under investigation by the police.

5.33 In accordance with Charity Commission requirements, the Chief Executive or Executive Director of Finance and Investment must inform People Services if they are convicted an offence which automatically disqualifies them from holding their posts.

Funds, resources and personal benefit

5.34 Employees must not misuse Livin's funds or resources, or seek preferential treatment for their own personal benefit.

5.35 Employees must ensure that Livin's funds and resources are used lawfully, properly and efficiently. Employees' procurement decisions must be guided by Livin's policies and fairness in decision-making, and in line with relevant law. In all situations employees shall strive to ensure value for money and to ensure that they do not expose Livin to legal action.

5.36 Employees must take all reasonable measures to protect Livin's funds, resources, property and assets from fraud, theft, damage, and misuse.

5.37 If employees claim reimbursement for any expenses they must do so in line with Livin's policies and procedures.

Information security

5.38 Employees must at all times comply with Livin's policies relating to information security. Employees must never up/download or use unauthorised or unlicensed software on Livin's systems, or otherwise use unauthorised or unlicensed software or hardware for business purposes. Employees must not copy software products licensed to Livin.

5.39 Employees must comply with the Acceptable Use Policy. Business email must not normally be used for personal reasons and must not be used to set up personal online accounts or subscriptions. Employees may access the internet, personal emails and social media while at work for reasonable and appropriate personal use, using Livin's or their personal devices.

5.40 Any accidents, incidents or near misses resulting from employee negligence and/or non-compliance information security policies and procedures, will be addressed via the Disciplinary Procedure.

Confidentiality

5.41 Employees must at all times process information in accordance with the law and Livin's policies and procedures, including all published privacy notices.

5.42 Employees must not disclose, without the required permission and authority, any personal data about Board members, tenants, customers, other employees or any other party.

5.43 Employees must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after employees have left Livin.

5.44 Employees 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 Livin.

5.45 If contacted directly by the press or media, employees must refrain from comment and pass enquiries to or otherwise notify the Marketing and Transformation Manager.

5.46 Employees must not prevent another person from gaining access to information to which they are entitled to by law.

5.47 Any accidents, incidents or near misses resulting from employee negligence and/or non-compliance with information governance policies and procedures, will be addressed via the Disciplinary Procedure.

Reporting concerns

5.48 Livin is committed to the highest standards of openness and accountability. Employees must report to their line manager or other appropriate person any reasonable suspicions they have about possible wrongdoing in line with Livin's relevant policies and procedures.

5.49 If employees have a concern about possible wrongdoing, they must immediately report it via the appropriate internal channel or external body. This includes becoming aware of potentially dishonest or fraudulent activity, and material breaches of this Code or relevant legislation including health and safety.

5.50 If employees believe that they are required to act in a way which conflicts with this Code or legislation, they must immediately report it via the appropriate channel.

5.51 Employees must not victimise or disadvantage any person who uses or intends to use Livin's Whistleblowing Procedure to report actual or alleged wrongdoing.

Professionalism and respect

5.52 Professionalism, consideration and respect for others, and a commitment to the principles of equality, diversity and inclusion, are fundamental to the delivery of Livin's social purpose.

Respect for others

5.53 Employees must comply with the requirements of the Equality, Diversity and Inclusion Policy. They must treat everyone they meet in the performance of their role with appropriate and equal respect, care and consideration.

5.54 Employees must promote, through their own behaviours, an organisational culture that is welcoming, accepting and accommodating to people of all backgrounds, cultures and personal and protected characteristics. Employees must show respect for individuals' chosen identities.

5.55 Employees must comply with the requirements of the Bullying and Harassment and Dignity and Work Policies. They must not harass, bully or attempt to intimidate any person, or use threatening or aggressive behaviour or other discriminatory behaviours.

5.56 Employees must not display materials in their workplace or use language in the performance of their roles which other people might reasonably find offensive.

5.57 Employees must report through appropriate channels any instances of unfair or unequal treatment in the workplace and, where it is their role to do so, investigate any such reports thoroughly, with compassion and respecting confidentiality.

Working with tenants and other customers

5.58 Employees must be professional, fair and courteous in all of their dealings with tenants and other customers.

5.59 In the delivery of services, employees must seek and value views from tenants and other customers when making decisions that will affect them.

5.60 Employees must not allow any personal relationship with a tenant or other customer to influence how they discharge their role and responsibilities.

5.61 Employees must not give personal gifts or loans of money to, or receive personal loans or gifts of money from, tenants or other customers.

5.62 Employees must handle tenants' and other customers' money only where absolutely necessary and ensure that a receipt is completed for every transaction. In all circumstances, employees must operate in accordance with Livin's financial policies, procedures and controls to ensure appropriate handling of all funds.

5.63 Employees must not invite or influence a tenant or other customer unless they are a person who they are closely connected to, to make a will or trust under which they are named as executor, trustee, or beneficiary.

Professional relationships

5.64 Employees must maintain constructive, professional relationships with Board members and involved tenants, based on a sound understanding of their respective roles.

5.65 Employees must behave in a professional manner, maintaining independence and integrity at all times.

5.66 Employees must not use informal channels to lobby or influence Board members or involved tenants on matters of the Livin's business.

5.67 Employees must not ask or encourage the commitment of wrongdoing, including any breach of this Code.

5.68 Employees must not knowingly mislead Livin's Board or committees. In presenting information, employees must set out the facts and relevant issues and risks truthfully.

Learning and development

5.69 Employees must play an active part in the supervision and performance appraisal processes applying to them and must make any personal learning and development needs relevant to their role known to their manager.

5.70 Employees must take responsibility for their own learning and development, regularly updating and refreshing their skills and knowledge. Unless there are exceptional reasons, employees must attend learning and development events as required.

5.71 Employees must offer open and constructive feedback to others and invite feedback about their own performance.

Health and safety and the environment

Health, safety and security

5.72 Employees must comply with the requirements of the Corporate Health and Safety Policy and its supporting policies and procedures.

5.73 Employees' conduct, actions and decision making must promote the health, safety, security and wellbeing of themselves and others. They must not knowingly put their own or others' health, safety, security or wellbeing unnecessarily at risk.

5.74 Employees must comply with Livin's Substance Misuse and No Smoking Policies.

5.75 If employees have any concerns about the health, safety, security or wellbeing of themselves, another individual or a group of individuals connected with Livin, they must report this immediately through the appropriate channels.

5.76 Any accidents, incidents or near misses resulting from employee negligence and/or non-compliance with health and safety policies and procedures, will be addressed via the Disciplinary Procedure.

Safeguarding

5.77 Employees must comply with Livin's Safeguarding Policy and protect children, young people and adults at risk from significant harm by reporting any safeguarding concerns in accordance with the relevant procedures.

Protecting the environment

5.78 In carrying out actions or making decisions in the performance of their role, employees must avoid serious environmental impacts, and where they are able, seek to achieve positive environmental outcomes.

6.0 Breaches of the Employee Code of Conduct

6.1 Where required, alleged breaches of this Code will be promptly investigated in line with the Disciplinary Procedure. Any significant breaches may be reported to Board and, if required, the Regulator of Social Housing, other relevant regulators, and/or relevant law enforcement agencies.

7.0 Monitoring and Review

7.1 Compliance with the NHF's Code of Conduct and Livin's Employee Code of Conduct will be assessed annually using appropriate metrics, with this assessment reported to the Board.

7.2 This Code will be reviewed no less than every three years following the independent triennial review of Board and committee effectiveness. There will be an automatic review of the Code if there is any change to the adopted Codes of Governance and Conduct or any statutory or regulatory provisions.