

Code of Conduct for Employees

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Department	Business Support & Transformation
Author	Head of HR & OD
Reason for Policy Creation/Revision	New
Data Protection	This complies with Hanover's Data Protection policy and procedure
Equalities	Not relevant at this time
Sustainability	No issues
Proof Read By	Director of Business Support & Transformation
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Approved By	ELT
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Audience – Training and Awareness Approach	All employees and workers
Effective Date	3 August 2022
Internal References – Policies & Procedures (Located on The Hub)	Entitlements, Payments, Benefits policy and procedure Policy and Guidance on the use of Social Media Whistleblowing policy Procurement policy and procedure Equalities policy Anti Fraud Framework Disciplinary policy and procedure Dignity at Work policy Health, Safety & Wellbeing policy Data Protection policy Money Handling by Staff on Developments policy Complaints policy
External References	The Scottish Housing Regulator (SHR) – Standards of Governance and Financial Management

Scottish Federation of Housing Associations (SFHA) & Employers in Voluntary Housing (EVH) Code of Conduct
Scottish Social Services Council (SSSC) Code of Practice

1. Purpose of this Code of Conduct

- 1.1 Hanover works hard to achieve its strategic plan, mission and values. This code of conduct will help you live by the values and provide guidance in the face of ethical dilemmas you may experience. It attaches the greatest importance to ensuring that high standards of behaviour are demonstrated by all of our employees and workers and in all of our activities.
- 1.2 There are references throughout this Code of Conduct (the Code) to 'l' and 'you' which means the employee, relief worker or volunteer of Hanover. References to 'we', 'us' and 'our' mean Hanover.

2. Scope of the Code of Conduct

- 2.1 This code of conduct is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations which the Scottish Housing Regulator (SHR) has confirmed fully complies with its Regulatory Standards and our Care requirements to comply with the Scottish Social Services Code of Practice.
- 2.2 This code of conduct, together with the policies, procedures and terms and conditions of employment as detailed in your employment contract, provides a framework within which all Hanover employees, regardless of location or role, undertake to discharge their duties and to regulate their conduct.
- 2.3 You must make yourself familiar with the terms of this Code and act in accordance with its requirements at all times. You are required to sign the Code (which is a Microsoft form) to confirm that you have read and understood the terms of the Code and you have a personal responsibility to uphold the requirements of this Code.
- 2.4 You must also ensure you are familiar with and comply with all of our policies.
- 2.5 Any breach may result in disciplinary action and in some cases gross misconduct depending on the situation.
- 2.6 If there are any aspects of this Code, or of any of the related policies, on which you are unclear, you must seek guidance from your manager.or Human Resource department, who will also be able to give guidance where you are unsure how the Code applies in a particular situation.

3. Employee Responsibility

3.1 This Code of Conduct applies to everyone who works for us whether you are employed on a permanent, fixed term or temporary basis, or are engaged as a casual worker or volunteer. It also applies to those working on a contract or consultancy basis whether signed or not.

- 3.2 A copy of this Code will be given to every person who joins Hanover and existing staff working for Hanover.
- 3.3 The Code is not exhaustive. Everyone is responsible for ensuring that their conduct at all times meets the high standards that our sector is recognised for upholding. As well as observing the detail of the Code, you should apply its intention and spirit to all situations in employment.
- 3.4 The code forms part of the terms and conditions of employment.

4. Managers' Additional Responsibilities

- 4.1 To serve as a role model for supporting our vision and values.
- 4.2 To clearly communicate expectations for high standards in those they lead.
- 4.3 To promote a culture of trust, open communication and respect.
- 4.4 To take action where nonadherence and poor behaviour is noticed.

5. Our Values

- 5.1 Our code of conduct is built around Hanover's core values.
 - Show Respect
 - Be Accountable
 - Support Collaboration
 - Promote Inclusion

6. Following the Code Of Conduct

6.1 I must act at all times with honesty and integrity. I must not use, or seek to use, my position to gain financial or other benefit for myself, my family or friends.

7. Working with our customers

- 7.1 I will maintain high standards of professionalism, fairness and courtesy in all my dealings with our customers.
- 7.2 I will not allow any personal relationship with a customer to conflict with the conduct of my role and responsibilities.

7.3 I will use the appropriate channels such as Hanover's Complaints Policy & Procedure for handling customer issues. I will not act outside our established procedures in any matter concerning any customer.

8. Showing respect for others in line with our values

- 8.1 I will always treat others with courtesy and respect. I will consider and respect the views of others.
- 8.2 I will always conduct myself in a courteous and professional manner. I will not, by my actions or behaviour, cause distress, alarm or offence.
- 8.3 I will not harass, bully or attempt to intimidate any person. Our Dignity at Work Policy gives more information.
- 8.4 I will adhere to both the letter and the spirit of our Equality, diversity and Inclusion Policy.
- 8.5 I will consider the language I use at all times to ensure it is appropriate and that it is aligned to Hanover's values and policies.
- 8.6 I will take care when displaying materials in the office and ensure that these would not reasonably cause offence to my colleagues.
- 8.7 When attending meetings, I will be courteous to all attendees and respect the position of the meeting chair, convenor or facilitator.

9. Gifts and hospitality

9.1 I cannot accept money, gifts, services, entertainment or any other items of value which may influence my actions or decisions. Hanover's Entitlement Payments and Benefits policy which includes a section on gifts and hospitality must be read and followed.

10. Prevention of bribery

- 10.1.1 Hanover's employees and Workers must comply with anti-bribery legislation.
- 10.2 Hanover forbids all forms of bribery meaning a financial or other advantage, or inducement, intended to persuade someone to perform improperly, any function or activity.
- 10.3 I will not offer, seek or accept bribes or other inducements from any individual or organisation and I will comply fully with Hanover's Fraud Prevention Policy.

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10.4 I will report to my manager, a member of SMT or the Chief Executive any instances of suspected bribery or corruption within the organisation or any external organisation with which we have dealings.

11. Personal benefit

- 11.1 I recognise that neither I, nor someone closely connected to me, can as a result of my role with the organisation receive preferential treatment relating to any services provided by the organisation or its contractors/suppliers: I will ensure that I can demonstrate this.
- 11.2 I will not use, or seek to use, my position to promote my personal interests or those of any person with whom I am closely connected, or the interests of any business or other organisation with which I have a connection.

12. Resources, facilities and premises

- 12.1 I will only use our resources, facilities and premises for the purposes intended and in a responsible and lawful manner. This includes office premises, telephone, computer and other IT facilities, in line with our ICT policy and procedure, equipment, stationery, transport and employees.
- 12.2 I will comply with all of our relevant policies, including (but not exclusively) Policy & Guidance on the use of social media, health & safety, equalities, human rights and diversity and dignity at work.
- 12.3 I will not undertake work for another organisation or for any personal business on Hanover's premises nor use our resources or facilities for such a purpose, unless I first have specific permission from my manager.

13. Funds and expenses

- 13.1 I recognise that Hanover's funds must be safeguarded from abuse, theft or waste. At all times, I will apply and observe all of our financial regulations and internal controls as per our Financial Control Framework.
- 13.2 I will comply with our Procurement policies when procuring goods/services.
- 13.3 I will comply with our Expenses Policy when claiming expenses.

14. Customers and money

- 14.1 In relation to our customers I will not:
 - Give or loan them money.
 - Receive a gift or loan of money from them.

 Invite or influence them to make a will or trust under which I am named as executor, trustee or beneficiary.

15. Declaring interests

- 15.1 I recognise that Hanover must ensure that no conflict arises, or could reasonably be perceived to arise, between my duties and my personal interests, financial or otherwise. I will declare, and manage openly and appropriately, any actual or potential interests or conflicts.
- 15.2 Where I have a personal, business or financial interest in any matter that is relevant to Hanover's activities or is being considered (or is likely to be considered), or I know that someone to whom I am closely connected has such an interest, I will declare it promptly and record it Entitlements, Payments and Benefits policy.
- 15.3 I will keep my entry in the Register of Interests complete, accurate and up to date.

16. Handling information

- 16.1 I will observe and uphold the legal requirements and our Data Protection policy in respect of the storage and handling of information, including personal and financial information. Our Data Protection policy gives further guidance.
- 16.2 I will respond to requests for information positively and will not prevent people or bodies from being provided with information that they are entitled to receive. I will notify the Governance Officer of any Subject Access Requests, Freedom of Information Requests or Environmental Impact Requests as outlined in the Data Protection policy.
- 16.3 I will not use confidential information acquired through my work for my private interests or any other purpose for which it is not intended.

17. Respecting confidentiality

- 17.1 I will respect the confidentiality of Hanover customers, and external partners and ensure that I do not disclose information to anyone who is not entitled to receive it, both whilst I am an employee and after I have left employment at Hanover.
- 17.2 Unless specifically authorised to do so, I will not make comments or statements in public or to the media or on social media sites or pass any documents or other information to the press or media about us or our activities. I will pass any such enquiries to the Communications Manager / Team quickly.

17.3 I will not publish any material or deliver any lecture or address any issues relating specifically to us or our activities without prior approval from our communication team. This includes invitations to speak at conferences or external events.

18. Using social media

18.1 I will not disclose any private or confidential information relating to us, our customers, partners, suppliers, board members, or employees on any social networking sites, bulletin boards, blogs or similar. This applies whether I am posting under my own name or a pseudonym. This is in line with our social media policy.

19. Reporting concerns

- 19.1 If I become aware of any actual or potential fraud, corruption or wrongdoing, or breaches of this Code, I will report this to my manager. I am aware that I may do so on a confidential basis. Our policy on whistleblowing gives further information.
- 19.2 I will not victimise any person who has used or intends to use/is suspected of having used our confidential reporting or whistleblowing procedures to report any actual or alleged fraud, corruption or wrongdoing by others.

20. Fulfilling your role

- 20.1 I will comply with the terms of my appointment and our policies and procedures relating to my role.
- 20.2 I will fulfil my duties responsibly, exercising reasonable skill and care and acting at all times in Hanover's best interests and that of our customers.
- 20.3 I will always aim to put the needs of Hanover's customers first in my day-to-day work, within the framework of our policies and procedures.
- 20.4 I will uphold and promote Hanover's values, aims and objectives.
- 20.5 If I am in doubt as to the legal and regulatory requirements that are relevant to my role, I will seek guidance from my manager.
- 20.6 I will consult my manager before taking on any outside work or any position (paid or unpaid) that could in any way impact on my role with Hanover. I recognise that any such work or position must not interfere with my existing job or conflict with Hanover's interests.
- 20.7 I will participate in any necessary training and play a constructive part in our performance appraisal process. I will contribute to the identification of any personal

- training and development needs, I may have in order to keep my professional skills and knowledge up to date.
- 20.8 I will take direction from my manager, and other senior managers and the Board, and exercise responsibly any authority that comes with my role as an employee.
- 20.9 I will not seek to use informal channels to influence the Board regarding decisions to be made about the conduct of our business.

21. Upholding our reputation

- 21.1 I will not act in a way that could reasonably be regarded as bringing Hanover into disrepute. This would include publicly making any derogatory comments about the organisation, its employees, Board members, customers, partners and anyone that we are doing business with.
- 21.2 I will always be a positive ambassador for Hanover and our work, especially when attending events as an employee or in dealing with outside bodies.

22. Breach of the Code

- 22.1 As employee you have a responsibility to promote and uphold the requirements of this Code and any other Code that your membership of a relevant professional body imposes. If you consider that you may have breached this Code or have witnessed or become aware of a potential breach by another employee, you should immediately bring the matter to the attention of your manager.
- 22.2 Any material breach of the Code will be considered under our Disciplinary policy & procedures and may result in a disciplinary action being taken, which may include dismissal.
- 22.3 As an employee there is a duty to co-operate with and contribute to any investigation relating to a potential breach of the Code or an associated matter.

You must sign the below statement of acceptance once you have read and understood this Code and its requirements.

Statement of Acceptance and Signature

I have read and understood the terms of this Code of Conduct and I agree to uphold its requirements in all my activities as an employee of Hanover.

I confirm that I am aware that I must declare and manage any personal interests in accordance with our policy. I agree to review all relevant Registers regularly to ensure that all entries relating to me are accurate.

I understand that, if I am found to have breached any points mentioned in this Code of Conduct or acted against its spirit, action will be taken in accordance with [name of organisation's) disciplinary procedures and could ultimately result in my dismissal.

Name	
Job Title	
Signature	
Date	