



## Code of Conduct Policy

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Version 3

**Approved by:** Board  
**Approved date:** 19 July 2017

### 1.0 Introduction

- 1.1 The purpose of the Policy is to provide clear information on the required conduct and behaviour from all Optivo employees, governance members (including involved residents), volunteers, agency workers, contractors and consultants both at work and work-related functions taking place outside of normal working hours.
- 1.2 This Policy confirms Optivo's commitment to the Seven Principles of Public Life (see appendix A) and incorporates the requirements of the National Housing Federation's Code of Conduct and its accompanying resource 'Conduct becoming'. Everyone at Optivo is required to sign up to this Policy to ensure their actions and behaviour are consistent with Optivo's values by acknowledging they have read it and agree to comply with it at all times whilst working with Optivo (see page 8).
- 1.3 If you have any queries about this Policy or a specific requirement, you should seek guidance from your line manager, the Executive Director of Governance and Compliance or Executive Director of People & Communications.

### 2.0 Key Policy requirements

#### 2.1 Equality, diversity and inclusion

- 2.1.1 Optivo is committed to embedding the principles of equality and diversity within the workplace and the wider community in line with the Equalities Act 2010:
  - The promotion of inclusivity and valuing diversity in the workplace is the responsibility of all.
  - The work environment will be supportive and one where respect is shown to all.
  - Everyone, regardless of their gender, race, ethnic background, culture, disability, sexual orientation, age, religion, socio-economic status or any other factor, will be supported and encouraged to perform to their full potential.
- 2.1.2 You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.
- 2.1.3 All information referred to in this Policy can be made available in alternative

formats, such as large print, audio, Braille and other languages on request to the Governance Team.

## **2.2 Health, Safety and Security**

2.2.1 Optivo places a high priority on health and safety, compliance with the Health and Safety at Work Act 1974 and all other associated legislation.

- We all have a responsibility for health and safety in the workplace and compliance with all relevant legislation.
- You must ensure you take care for your individual safety and that of others in the workplace.
- You must co-operate with us on all health and safety related matters and comply with Optivo's Health and Safety Policy.

2.2.2 Your conduct must not endanger the health, safety or security of yourself or others.

## **2.3 Harassment and Bullying**

2.3.1 The environment we work in should be free from harassment, bullying or intimidation. Everyone is responsible for their behaviour, whether intentional or unintentional and we must ensure that it does not constitute harassment.

## **2.4 Confidential reporting (whistleblowing)**

2.4.1 Our Whistleblowing Policy allows you to raise concerns that are in the public interest which you have in relation to any wrongdoing, including any activity which may be considered illegal, improper or unethical.

2.4.2 You must report any reasonable and honest suspicions you have about possible wrongdoing. Full details of how to report your concerns are set out in Optivo's Whistleblowing Policy.

## **2.5 Confidential Information**

2.5.1 You are expected to deal with all confidential information you have access to in an appropriate and sensitive manner, and only use it for the authorised delivery of your duties.

2.5.2 All confidential information must remain so and must not be discussed outside the work environment.

2.5.3 All Optivo information, confidential or not, must not be used for commercial or personal gain or any non-Optivo interests.

## **2.6 Data protection and confidentiality**

2.6.1 All information/data must be handled in accordance with the law, Optivo's Data Protection and Confidentiality Policy and must comply with the Data

Protection Principles set out in the Data Protection Act 1998. Any doubt or queries regarding data protection should be referred to Optivo's Governance Team

- 2.6.2 Our work involves handling confidential information about our residents and service users, as well as Optivo's business, and confidentiality must be maintained at all time. For further details, please refer to Optivo's Data Protection Policy.
- 2.6.3 You must respect the appropriate channels for handling tenancy and service provision issues. You must not act outside of Optivo's established procedures in any matter which concerns any resident or other service user.

## **2.7 Information Technology and Social Media**

- 2.7.1 Access to information technology is made available via the internet, intranet, telephone system and emails to enable you to carry out your role or work activities. You are required to comply with the Information Technology Acceptable Usage Policy.
- 2.7.2 You must not share information on social media sites which could bring you, our residents, customers or our organisation into disrepute. You must not share any confidential information regarding Optivo on social media sites.
- 2.7.3 You must not bring Optivo's name into disrepute or affect its integrity by your actions or words, either within the organisation or outside, including the use of social networking sites. This includes making derogatory comments about Optivo, its residents or service users, partners or services either in person or in writing or via any web-based media such as a personal blog or other site. This also applies if you do not name Optivo, but where its identity can reasonably be inferred. If you have a genuine concern about possible wrongdoing, refer to section 2.4 above.

## **2.8 The media**

- 2.8.1 Any contact from the press, media or associated bodies with requests for information or interviews must be referred to the Communications Team.
- 2.8.2 You must not engage in discussions or provide responses to the media without appropriate briefing and first discussing the matter with, and getting permission from, the appropriate director or designated representative.

## **2.9 Relationships with residents/service users**

- 2.9.1 You must be careful of developing personal relationships with residents/ service users to avoid your position of trust being compromised. You are not permitted to accept legacies from Optivo residents, clients or service users, unless the donor is related to you. You must maintain high standards of professionalism, fairness and courtesy in all your dealings with residents and other service users.

2.9.2 Governance members, including involved residents, and staff must maintain a constructive, professional relationship based on a sound understanding of their respective roles.

## **2.10 Bribery, Gifts and Hospitality**

2.10.1 You must not offer, seek or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts, 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.

2.10.2 The giving and receiving of gifts is discouraged and should be avoided except in limited circumstances. All hospitality must be declared and registered and no cash gifts accepted under any circumstances. Full details can be found in Optivo's Gifts and Hospitality Policy.

## **2.11 Funds and resources**

2.11.1 You must not misuse Optivo's funds or resources and when entrusted to you, ensure they are used efficiently, economically and effectively and protected from theft, damage and misuse. 'Resources' includes staff, information, telephone, computer and other IT facilities, equipment, stationery and transport.

2.11.2 You must comply with Optivo's policies and procedures relating to procurement, ensuring Value for Money and fairness in decision making.

2.11.3 You must comply with Optivo's Information Technology Acceptable Usage Policy and any documents which set out the acceptable use of Optivo's email system, the internet and intranet and the use of unauthorised or unlicensed software.

2.11.4 If you claim reimbursement for expenditure, it must be properly and reasonably incurred in line with Optivo's Expenses policies.

## **3.0 Conduct**

### **3.1 Performance**

3.1.1 You are expected to follow all reasonable rules and instructions given by those supervising or managing your activities and/or work areas.

### **3.2 Attendance**

3.2.1 You must comply with our policies and procedures regarding your attendance at work.

### **3.3 Conduct at meetings**

3.3.1 Your conduct at all meetings must meet a high standard of integrity, commitment and courtesy.

### **3.4 Collective decision making**

3.4.1 You must respect the principle of collective decision making and corporate responsibility. This means that once a decision has been formally reached, you must share responsibility for that decision and support it regardless of your personal views.

### **3.5 Representing Optivo**

3.5.1 In representing Optivo at external events and in dealings with outside bodies, you must uphold and promote Optivo's values, objectives and policies.

3.5.2 You must not conduct yourself in a manner which could reasonably be regarded as bringing Optivo into disrepute. This includes membership of, or participation in, activities organised by groups or organisations whose values are not consistent with Optivo's and may create doubt in your ability to comply with Optivo's values and the Code of Conduct.

### **3.6 Learning and development**

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

### **3.7 Misuse of drugs and alcohol**

3.7.1 It is a disciplinary offence to be on Optivo premises and/or carrying out official duties while under the influence of alcohol or non-medically prescribed drugs.

### **3.8 Conflicts of Interest**

3.8.1 You must take all reasonable steps to ensure that no undeclared conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise.

3.8.2 Outside work activities or interests which may have a bearing on your employment with Optivo must be discussed with your line manager. You must not engage in any political or campaigning activity that might compromise Optivo's position. Governance members, including involved residents, intending to stand for political office must discuss this with the Chair or an appropriate senior manager, in advance of doing so.

3.8.3 You must not misuse your position, for example by using information acquired in the course of your duties for your private interests or those of others.

3.8.4 Board and independent committee members taking up new employment or appointments during their term of office with Optivo must ensure it will not interfere with their role and update their declaration of interest.

- 3.8.5 Staff members must consult with their manager before taking on any outside work or any paid/unpaid position. Any such work or position must not interfere with your existing job or conflict with the interests of your role or Optivo's interests.
- 3.8.6 Staff members starting relationships with other staff members must inform their line manager. Staff in relationships with other staff must declare the relationship in their annual declaration of interest form.
- 3.8.7 Potential conflicts of interest must be declared so that individuals are not involved in decisions where their actions could be perceived as biased. A Declaration of Interest form must be completed on an annual basis, or sooner if your circumstances change. See Optivo's Probity Policy for further details.

### **3.9 Appearance/Dress Code**

- 3.9.1 You must dress appropriately for your role and duties and present a professional image that reflects our customer focused organisation.
- 3.9.2 If you work within a customer facing team, you may be provided with the appropriate uniform which should be worn at all times while representing Optivo.
- 3.9.3 When representing Optivo at formal or informal events, you must be appropriately dressed for the occasion.
- 3.9.4 Personal jewellery should be suitable for an office environment. Optivo reserves the right to request any piercing to be temporarily removed should there be a health and safety consideration.

### **4.0 Roles and responsibilities**

- 4.1 Everyone must:
- Fulfill their duties and obligations responsibly, acting at all times in good faith and in the best interests of Optivo, its residents and service users
  - Maintain conduct of the highest standard to ensure that confidence in integrity is maintained
  - Incorporate and promote equality and diversity in all that you do
  - Be committed to delivering Optivo's vision and values in all activities at work
  - Treat all people with dignity and respect at all times
  - Comply with the law, your terms of appointment and all relevant policies and procedures.
- 4.2 In addition to the above, managers and leaders will:
- Role model the expected standards of behaviour
  - Explain and reinforce the required standards to promote understanding
  - Coach, support and feedback to others to enhance standards of behaviour
  - Take appropriate action at the earliest opportunity to manage non-compliance of the required standards of behaviour.

#### 4.3 Optivo will:

- Comply with all relevant legislation
- Provide a safe, secure and healthy working environment and not compromise the health or safety of any individual
- Treat everyone fairly
- Develop and value our people
- Seek to obtain best value for money
- Consult widely with employees on matters that affect employment.

### 5.0 Breaches of this Policy

5.1 This Policy is subject to change. You must comply with the provisions of this Policy and all other Optivo policies and procedures. Failure to follow the Code of Conduct may damage Optivo's reputation, and any breaches will be taken seriously and could result in disciplinary action being taken.

5.2 If you believe you are being required to act in a way which conflicts with this code, you must report it to an appropriate senior manager within Optivo.

### 6.0 Communications and awareness

6.1 The Code of Conduct and associated policies will be:

- Publicised on the Optivo Intranet
- Made available to all employees at their induction
- Publicised periodically through employee communications
- Promoted through targeted training for managers and employees in specific areas (i.e. Data Protection and Equality & Diversity training).

### 7.0 Related documents

- Related HR policies including Disciplinary and Absence Management policies and procedures
- Anti-Fraud, Bribery and Corruption Policy
- [Probity Policy](#)
- Equality & Diversity Policy
- Mileage & Expenses Policy
- [Health & Safety Policy](#)
- NHF Codes of Conduct and Governance
- IT Acceptable Use Policy
- [Whistleblowing Policy](#) and Procedure
- [Data Protection Policy](#).

## **8.0 Review**

- 9.1 This Policy will be reviewed as part of the next Governance Review planned to commence in October 2018. If necessary, the Policy will be reviewed sooner to incorporate legislative, regulatory, best practice developments, or address operational issues and any proposed changes will be presented to the Optivo Board for approval.



**Acknowledgement**

I acknowledge that I have read and understand the Code of Conduct Policy. In signing this copy, I agree to comply with the Code of Conduct at all times whilst working with Optivo, and thereafter with respect to the use of confidential information during my employment.

Signed: \_\_\_\_\_

Print name: \_\_\_\_\_

Date: \_\_\_\_\_

Please return a signed copy by email to: [HRAdmin@optivo.org.uk](mailto:HRAdmin@optivo.org.uk)

*\*Note: Governance members (including involved residents) will 'sign' this agreement electronically through MyAccount, as part of their agreement to comply with the Probity Policy.*