CASSILTOUN GROUP CODE OF CONDUCT FOR STAFF

Date Approved	Proposed Review Date
October 2024	October 2027
Chair Person/Office Bearers Signature:	

Castlemilk Stables, 59 MACHRIE ROAD, GLASGOW G45 OAZ

CASSILTOUN HOUSING ASSOCIATION LIMITED	*Charity SC035544*
CASSILTOUN TRUST	*Charity SC030310*
CASSILTOUN STABLES NURSERY LIMITED	*Charity SC043312*

1. Introduction

RSLs are required to conduct their affairs with honesty and integrity; to support this, each is expected to have an 'appropriate Code of Conduct in place that sets out the standards of behaviour expected from staff and governing body members. SFHA has produced this model Code of Conduct for staff, in consultation with EVH, which has been endorsed by the SHR. Consequently, RSLs which adopt this model, without material amendment, can be confident that they comply with regulatory standard 5.2. The Staff Code of Conduct sets out similar expectations to those contained in SFHA's Model code of Conduct for GBMs.

This model was updated in October 2024. SFHA commissioned Linda Ewart to draft the revisions on our behalf.

The update was informed by consultation, which included:

- **Feedback from SFHA members via the Governance and Governing Body Members Forums**
- **Consultation with a working group of SFHA members**
- **Input from the Scottish Housing Regulator**
- **Input from EVH**

SFHA would like to acknowledge and thank all who contributed to this process.

2. How to use the Model Code of Conduct for Staff

The SFHA and EVH Model Code of Conduct for Staff is included as Appendix A.

The Code is divided into three groups of principles that all members of staff must adhere and commit to.

Each staff member must sign the Code of Conduct on appointment (as part of the induction process) and it should be signed annually thereafter. It can be useful to coincide this with the annual appraisal.

Prior to issuing to your staff members, the model should be customised to reflect your

organisational details, and at several points square brackets are included as a prompt to insert details pertinent to your RSL, e.g. Cassiltoun HA

Individual RSLs must include references to relevant organisational policies and procedures, such as Dignity at Work, Health and Safety, Equality, Diversity and Human Rights, Grievance and Disciplinary, where appropriate. Any potential breach of the Code would require to be managed according to the organisational policy / contractual terms relating to discipline or grievance.

3. How to use further guidance

Some brief further guidance on implementing the Model Code for Staff is included at Appendix B.

It is important to note that this guidance does not form part of the Code of Conduct, and it is only the Code itself that staff members will sign up to. It is not intended that this guidance be issued to staff alongside the code, as it is instead intended as guidance to organisations to assist in the implementation and interpretation of the Code.

Introduction

There are references throughout this Code of Conduct (the Code) to 'I' and 'you' which means the member of staff of **Cassiltoun Group** *who has signed this Code. References to 'we', 'us' and 'our' mean* **Cassiltoun Group**

1. **Cassiltoun Group** attaches the greatest importance to ensuring that high standards of behaviour are demonstrated by all of our people and in all of our activities.

2. This Code of Conduct sets out the standards of conduct required of you as a member of our staff. You are required to observe these standards in all the activities that you undertake in connection with your employment with us. You are also required to uphold our Values which are



3. As a Registered Social Landlord (RSL), we are required to adopt and comply with an appropriate Code of Conduct[1]. This Code is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations with input from Employers in Voluntary Housing (EVH) – which the Scottish Housing Regulator (SHR) has confirmed fully complies with its Regulatory Standards.

[1] Scottish Housing Regulator (2024) Regulatory Framework, Regulatory Standard 5.2

4. 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 (in the 'Statement of the Acceptance' on p12) 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.

5. You must also ensure you are familiar with - and comply with - all of our policies.

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. Your manager, or the Head of Corporate, HR & Finance, will also be able to give guidance where you are unsure how the Code or related policies apply in a particular situation.

7. This Code of Conduct was adopted by the Staffing Sub Committee on 31st October 2024. .

Who this code applies to

8. This Code of Conduct applies to everyone who works for us whether employed directly or otherwise.

9. A copy of this Code will be given to every person it applies to.

How the Code is structured

10. The Code is based on the Nolan Principles on Standards in Public Life[2] which are recognised as defining good conduct for those who work for the public using public money.

11. We have defined three groups of principles as the basis for the Code:

A **Honesty and Integrity**

B **Openness and Accountability**

C **Selflessness, Objectivity and Leadership**

12. Each of the three sections begins with a statement of principle. This is followed by a number of provisions which set out the requirements of the Code in more detail.

The Code is not exhaustive and it should be remembered that all staff members of RSLs and their subsidiaries are responsible for ensuring that their conduct at all times meets the high standards that the RSL 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.

You are required to sign the Statement of Acceptance at the conclusion of this code on page 10 which also outlines the implications for any breach of the code.

[2] Committee for Standards in Public Life (May 1995), Nolan Principles

The Code of Conduct

A. Honesty and Integrity

You must act at all times with honesty and integrity. You must not use, or seek to use, your position to gain financial or other benefit for yourself, your family or friends.

Gifts and hospitality

A.1 I will act, and ensure I am seen to act, wholly in the interests of our organisation, our tenants, other residents in our communities and other service users. I will ensure that I do not benefit improperly from my position.

A.2 I will not accept any offers of gifts or hospitality from individuals or organisations which might reasonably create – or be capable of creating – an impression of impropriety or influence or place me under an obligation to these individuals or organisations. I will comply with **the Cassiltoun Group's Entitlements Payments and Benefits** policy.

Prevention of bribery

A.3 We must comply with anti-bribery legislation. I will comply with our anti-bribery and corruption policies.

A.4 We forbid all forms of bribery - meaning a financial or other advantage or inducement intended to persuade someone to perform improperly any function or activity. I will not offer, seek or accept bribes or other inducements from any individual or organisation and I will comply fully with our policy on bribery (Anti Fraud Policy). I am aware that offering, seeking or accepting bribes or other inducements will result in disciplinary action and may also result in criminal prosecution.

A.5 I will report to my manager or the Head of Corporate, HR & Finance/Chief Executive Officer any instances of suspected bribery or corruption within the organisation or any external organisation with which we have dealings.

Personal benefit

A.6 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.

A.7 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.

Resources, facilities and premises

A.8 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, equipment, stationery, transport and staff.

A.9 I will comply with all of our relevant policies, including (but not exclusively) usage of internet & email social media, health & safety, equalities, inclusion, human rights and diversity and dignity at work.

A.10 I will not undertake work for another organisation - or for any personal business - on Cassiltoun Housing Association/Cassiltoun Stables Nursery premises nor use our resources or facilities for such a purpose, unless I first have specific permission from my line manager.

Funds and expenses

A.11 I recognise that **the Cassiltoun Group'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.

A.12 I will comply with our relevant policies when procuring goods/services and/or claiming expenses.

Tenants/service users and money

A.13 As a general rule, in relation to tenants and service users 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.

General responsibilities

A.14 I will not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.

I am aware that under the Equality Act 2010, the following nine characteristics are specifically protected: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

A.15 In presenting information I will take all reasonable steps to ensure that I set out the facts and relevant issues truthfully.

A.16 I will avoid any situation that could give rise to suspicion or suggest improper conduct.

A.17 I will inform my manager or the Head of Corporate, HR & Finance if I am notified of any action by a professional body that is relevant to my role with **the Cassiltoun Group** and/or which could impact **the Cassiltoun Group's** reputation that I am or may be party to.

B. Openness and Accountability

You must declare all relevant personal interests. You must handle information in accordance with our policies and procedures. You must report to the appropriate senior person (any member of the Senior Leadership Team) within the Cassiltoun Group any reasonable and honest suspicions you may have about possible wrongdoing.

Declaring interests

B.1 I recognise that **the Cassiltoun Group** 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.

B.2 Where I have a personal, business or financial interest in any matter that is relevant to **the Cassiltoun Group'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 in the Register of Interests.

B.3 I will keep my entry in the Register of Interests complete, accurate and up to date.

Handling information

B.4 I will observe and uphold the legal requirements and our policies in respect of the storage and handling of information, including personal and financial information. Our **Data Protection Policy** gives further guidance.

B.5 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.

B.6 I will not use confidential information acquired through my work as one of our employees for my private interests or any other purpose for which it is not intended.

Respecting confidentiality

B.7 I will respect confidentiality and ensure that I do not disclose information to anyone who is not entitled to receive it, both whilst I am a member of staff and after I have left employment at the Cassiltoun Group.

B.8 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 Chief Executive Officer** quickly.

B.9 I will not publish any material or deliver any lecture or address any issues relating specifically to us or our activities without prior approval. This includes invitations to speak at conferences or external events.

Using social media

B.10 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. (See also **C12** under "**Upholding our reputation**"). This applies whether I am posting under my own name or a pseudonym.

Reporting concerns

B.11 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 or to the Head of Corporate, HR & Finance/Chief Executive Officer. I am aware that I may do so on a confidential basis. Our policy on whistleblowing gives further information.

B.12 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.

C. Selflessness, Objectivity and Leadership

You must act in the best interests of **the Cassiltoun Group** at all times within the framework set by the organisation, working to promote our aims and objectives, upholding our values and setting a good example by your own conduct.

Fulfilling your role

C.1 I will comply with the terms of my appointment and our policies and procedures relating to my role.

C.2 I will fulfil my duties responsibly, exercising reasonable skill and care and acting at all times in **the Cassiltoun Group's** best interests and that of our tenants and other service users.

I will always aim to put the needs of **the Cassiltoun Group's** tenants and service users first in my day-to-day work, within the framework of our policies and procedures.

C.3 I will uphold and promote **Cassiltoun Housing Association/Cassiltoun Stables Nursery** values, aims and objectives and in accordance with the relevant legal and regulatory requirements (including those, as applicable, of the Scottish Housing Regulator, the Office of the Scottish Charity Regulator, the Financial Conduct Authority and the Care Inspectorate).

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.

C.4 I will work at all times in accordance with our policies and procedures and I will not allow my own personal or political opinions to affect the way in which I carry out my duties. This does not impinge on my right to be an active citizen or to be an active trade unionist.

C.5 I will take direction from my line manager, other senior managers and the governing body, and exercise responsibly any authority that comes with my role as a staff member.

C.6 I will not seek to use informal channels to influence the governing body regarding decisions to be made about the conduct of our business.

C.7 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 **the Cassiltoun Group.** I recognise that any such work or position must not interfere with my existing job or conflict with **the Cassiltoun Group's** interests.

C.8 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 needs I may have in order to keep my professional skills and knowledge up to date.

Working with tenants and other service users

C.9 I will maintain high standards of professionalism, fairness and courtesy in all my dealings with tenants and other service users.

C.10 I will not allow any personal relationship with a tenant or other service user to conflict with the conduct of my role and responsibilities.

C.11 I will use the appropriate channels for handling tenancy and service provision issues. I will not act outside our established procedures in any matter concerning any tenant or other service user.

Upholding our reputation

C.12 I will not act in a way that could reasonably be regarded as bringing or risks bringing **the Cassiltoun Group** into disrepute. This would include publicly making any derogatory comments about the organisation, its staff, governing body members, service users, partners and anyone that we are doing business with.

I will discuss any grievance or concern that I have about a member of staff or the Board with my line manager or with Chief Executive and/or Chairperson.

C.13 I will always be a positive ambassador for **the Cassiltoun Group** and our work, especially when attending events as a member of our staff or in dealing with outside bodies.

Showing respect for others

C.14 I will always treat others with courtesy and respect. I will consider and respect the views of others.

C.15 I will adhere to both the letter and the spirit of our equality diversity, inclusion and human rights policy and our Dignity at Work policy. See also **A.14** about the need to avoid discrimination of any kind.

C.16 I will always conduct myself in a courteous and professional manner. I will not, by my actions or behaviour, cause distress, alarm or offence.

C.17 I will not harass, bully or attempt to intimidate any person.

C.18 I will take care when displaying materials in the office and ensure that these would not reasonably cause offence to colleagues.

C.19 When attending meetings, I will be courteous to all attendees and respect the position of the meeting chair or convenor.

Breach of the Code

As a member of staff 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 staff member, you should immediately bring the matter to the attention of your manager or Head of Corporate, HR & Finance

Any material breach of the Code will be considered under our disciplinary procedures and may result in a disciplinary action being taken, which could, depending on the facts of the situation, include dismissal.

As a member of staff you have 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 a staff member of the Cassiltoun Group

I understand that the Code of Conduct applies regardless of where or how I am working and includes in the office, at meetings, at home and virtually.

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 Cassiltoun Housing Association/Cassiltoun Stables Nursery's disciplinary procedures and could ultimately result in my dismissal.

Signed _____

Date_____

Appendix B

Further Guidance on Implementing Model Code of Conduct for Staff

This Guidance has been prepared to assist organisations in implementing and applying the Code of Conduct for staff. It is not intended that the guidance is issued to staff members – rather it is aimed at organisations to assist in interpreting its terms.

The Code of Conduct sets out the requirements and expectations which are attached to the role of staff members, who have a personal responsibility to uphold both the spirit and the requirements of the Code. Each staff member must sign the Code of Conduct on appointment and it should be signed annually thereafter. It can be useful to coincide this with the annual appraisal.

The Code of Conduct is supported by the role description for individual posts. It should form part of the induction process for new staff.

Breach of the Code

If a complaint is made or concern is raised that a member of staff may have breached any part of the Code, the matter will be investigated in accordance with the terms of the RSL's disciplinary or grievance policy.

There are references throughout the Code to internal policies and procedures, which all staff are expected to be familiar with. The RSL must ensure that all staff are well informed about their responsibilities and have access to regular training and support to enable them to meet their requirements. Staff must also have ready access to the policies and procedures which they are expected to follow in order to fulfil their role and meet their commitments as set out in the Code of Conduct. (C3-C4)

How the Code is structured

The Code is based on the seven principles which are recognised as providing a framework for good governance. They demonstrate honesty, integrity and probity. It must be remembered that staff members and RSLs are always responsible for ensuring that their conduct at all times meets the high standards that the RSL sector is recognised for upholding.

In the Code, each principle is described, as it applies to the activities of an RSL and its staff. This guidance is offered to support the application of the Code of Conduct by providing some illustrations of the practical application of the Code's requirements. It is emphasised that the guidance is not exhaustive.

The seven principles are grouped together into three 'sections':
• Honesty and Integrity
• Openness and Accountability
• Selflessness, Objectivity, Leadership

The remainder of this guidance offers some illustrations of how each of the principles may be applied to the role of a staff member.
Please note, there are references throughout to the need for staff members to 'be familiar' with the terms of policies and other documents. This does not require a detailed knowledge of the content of all the documents but rather an awareness of their key principles and ready access to them in the event that the detail is necessary.

A. Honesty and Integrity
This principle emphasises the importance of always acting honestly and in good faith. In practice, this means that a staff member cannot accept gifts or hospitality that are not permitted by our Entitlement, Payment and Benefit policy.

Staff members have an individual duty to report any concerns they may have about possible fraud, corruption or wrong-doing (A5). Staff must, therefore, be familiar with the terms of our [Anti-Fraud] policy (A3; A4). Staff are expressly forbidden to accept any gifts or other inducements which might create, or be capable of creating, a sense of obligation to another party (A2).

A6-A7 further emphasise the responsibility to ensure that neither an individual member of staff, nor someone closely connected to them is seen to benefit inappropriately from their role with an RSL and that they must be very open in declaring all relevant personal interests. In practice, this means ensuring that staff are not involved in any decisions which personally impact or affect them or someone they are close to. This emphasises the need for openness in declaring interests. Declarations must be made to (or notified to) the line manager to ensure that there is an awareness of any situations which might require to be managed (B2 – B3). RSLs should ensure that staff members are aware that their Entitlement, Payment and Benefit policy explains how someone closely connected to you is identified.

A8-A12 stress the commitment to ensure that the RSL's funds and resources are used properly and for legitimate purposes. This means that decisions and actions in this respect must fit with, amongst other things:

- the RSL's permitted purpose and objectives,
- the RSL's business plan
- the terms of the RSL's loans and grant-making authorities,
- all relevant policies.

In relation to A8, please note reasonable personal use of office telephones and computers and company mobile telephones is permitted but must be kept to a minimum. Further information - including what is meant by 'reasonable personal use' – should be provided to the staff member in a relevant policy.

A9 means, among other things, that staff must uphold and be familiar with the RSL's policies relating to Equalities, Diversity, Inclusion and Human Rights and Dignity at Work. This requirement relates to all engagements with staff colleagues, governing body members, tenants, customers, partners and agents. In practice, this means listening to and considering other views and respecting opinions even if they are very different from an individual's own. Related to this, A14 is a specific commitment to promote and uphold the RSL's Equality and Diversity policy.

A13 states that as a general rule you cannot give (or receive) loans from tenants/service users. Please note that in circumstances where a staff member has a declared family connection to a tenant/service user, common sense should be applied and the organisation would not seek to impose restrictions on the private exchange of money between the staff member and that individual.

B. Openness and Accountability

This principle sets the framework for ensuring that transparency and openness are evident. In practice, this means that staff must identify and declare all personal interests which are relevant to the RSL's work and to their role with the organisation. Staff must be familiar with the process for declaring interests and must make sure that the Register of Interests is accurate and up to date at all times. Staff must ensure that they are well informed about the RSL's policy on declaring interests, which forms part of the organisation's Entitlements, Payments and Benefits Policy (B1 – B3).

Staff must always be careful and cautious about how their actions may be viewed by others and take care to avoid anything which could compromise or embarrass themselves or the RSL (B2).

B4 - B7 relate to confidentiality and the importance of maintaining it. This applies to the content of reports, discussions at governing body meetings and all other business that staff are engaged on. Upholding this principle requires staff to respond positively to requests for information (B5) but also not to discuss anything

that is identified as being confidential with anyone who is not entitled to the information (B7). It also means making sure that any papers are stored securely (e.g. by means of passwords on laptops or other devices, in a locked drawer) and that on-line discussions cannot be overheard (e.g. if attending a virtual meeting). In applying this principle, staff must also be mindful of the RSL's duties in respect of safeguarding personal information i.e. anything from which an individual can be identified. It must be remembered that the Code of Conduct applies regardless of where staff are working – in the office, at meetings, at home, virtually.

Our Scheme of Delegation identifies who is authorised to make public comments on our behalf. It is not normally appropriate for a staff member to speak in public without prior agreement from their line manager. This includes, for example, accepting an invitation to contribute to a conference or event (B9). The Code's principles also extend to social media activities (B8 and B10).

Please note, that RSLs must respect any member of staff's right to a private life, and that includes joining any social media sites that they may wish. However, as information posted on such sites is classed as public and not private, the clause at B10 relating to social media is necessary.

B11 refers to our Whistleblowing policy and sets out a commitment to report any suspicions of wrongdoing. B12 is a commitment not to victimise any colleague who may be party (directly or indirectly) to a whistleblowing action. This reflects the regulatory requirement for RSLs to have a whistleblowing policy, as well as Regulatory Standard 5.6 that requires 'clear procedures for employees and governing body members to raise concerns or whistleblow if they believe that there has been fraud, corruption or other wrongdoing within the RSL'

C. Selflessness, Objectivity and Leadership

The principle contains a commitment to always act in the RSL's best interests and to support and promote its aims and objectives. C2 is a commitment to put the

interests of tenants first, within the RSL's policy framework, and C3 is an express commitment to promote and uphold the organisation's values, aims and objectives. This commitment extends to ensuring that staff are familiar with relevant legal and regulatory requirements in exercising their responsibilities and states that they should seek advice from their line manager if in doubt.

C4 emphasises the importance of putting personal opinions aside when applying the RSL's policies and procedures, but is explicit is confirming that individuals have the right to be active in the workplace e.g. by taking on the role of shop steward or employee representative.

C6 highlights that individual staff members should not seek to 'lobby' members of the governing body, either individually or collectively. In practice, this principle seeks to ensure that relationships are professional: amicable and constructive with respect for the boundaries between the strategic role of the governing body member and the operational responsibilities of senior staff.

C7 is an obligation to consult with their line manager if a member of staff intends to take on an additional role. This could include, for example, becoming a member of the governing body of another RSL or voluntary organisation or contributing to the activities of a training or campaigning body. In considering such a proposal, it is important to ensure that there would be no conflict with or risk of compromise to the responsibilities associated with the employee's job.

C9-C11 are intended to emphasise the importance of staff maintaining professional and appropriate standards in all of their engagement with tenants and other customers.

C12 – C13 commit staff to refraining from publicly criticising or making negative comments about the RSL. This principle is not intended to prevent staff from disagreeing with a proposal or challenging a decision; rather it is intended to

ensure that they do not actively and/or publicly undermine the organisation. In practice, this means, for example, that staff should not question in public why a decision was taken or criticise the organisation. A similar provision is contained in the Code of Conduct for Governing Body Members.

C14 -C18 relate to the importance of staff being respectful and courteous in all actions associated with their role. C14 and C16 specify that staff will always be courteous and respectful to others and that their actions will not cause distress or alarm or offence. It also means recognising and acknowledging that what is acceptable in terms of language and conduct change and being mindful that differences in cultures, faiths and beliefs can be very significant and sensitive. C17 is an undertaking not to harass, bully or attempt to intimidate anyone – this applies to other members of staff, members of the governing body and to tenants and other customers. C18 is a reminder that care must be taken when displaying materials in the office environment and that staff must be mindful of the potential for offence to be caused by items that might seem insignificant (e.g. mugs, scarves). Whilst a ‘one-off’ instance of thoughtlessness in this regard may be unlikely to prompt formal action, it would be appropriate to remind people of their responsibilities under the terms of the Code under such circumstances.