



Northwards Housing
North Manchester's Council Homes

Code of Conduct
November 2010



Code of Conduct

Reasons for the Code of Conduct

- 1.1 The Board has responsibility for all actions carried out by employees and members throughout Northwards. This responsibility encompasses trusteeship of large sums of public and private money, and the housing and care of large numbers of people. Therefore, the Board is determined that the conduct of employees and members should give our residents, partners and funders confidence, show integrity, and at all times, avoid any suggestion of influence by improper motives.
- 1.2 The Board believes that employees and members, as well as residents, partners and funders, want to be associated with an organisation that publicises and upholds its values. Therefore this 'Code of Conduct' respects the seven principles of public life adopted by the Nolan Committee and goes beyond these. High standards of conduct imply disclosure of matters that might conceivably be seen as giving rise to a duality or conflict of interest, and require employees and members to uphold the spirit, as well as the wording, of this Code of Conduct.
- 1.3 The term 'we' has been used throughout to show that the Code of Conduct applies to all employees and all Board/Committee members. The term 'members' is used to describe all Board, and Committee members including Co-optees.
- 1.4 The seven principles of public life identified by the Nolan Committee in its first report guide the content of Code of Conduct:
 - **Selflessness:** take decisions solely in terms of Northwards' values and mission. We should not do so in order to gain financial or other material benefits for ourselves, our family or friends.
 - **Integrity:** not place ourselves under any financial or other obligation to outside individuals or organisations that might influence us in the performance of our duties.
 - **Objectivity:** ensure that in the delivery of services, the appointment of employees or the awarding of contracts, we ensure impartiality and that choices are made on merit alone.
 - **Accountability:** accept accountability for our decisions and actions to our

residents, the providers of public funds and other stakeholders, and submit ourselves to whatever scrutiny is appropriate.

- **Openness:** be as open as possible about all the decisions and actions that we take. We should give reasons for our decisions and restrict information only when individual or commercial confidentiality clearly so demand.
- **Honesty:** declare any private interests relating to our duties and take steps to resolve any conflicts arising in a way that is lawful, and protects Northwards' reputation, values and mission.
- **Leadership:** promote and support these principles by leadership and example.

2 A Summary of the Northwards Code of Conduct

- 2.1 To show that we do not get improper personal benefits from Northwards' activities, we must sign a 'Disclosure of Interest' form detailing any personal contacts we have with those who benefit in any way from Northwards' services.
- 2.2 We must be especially careful of relationships with residents, and never allow any personal relationship with a resident to conflict with their best interests.
- 2.3 Giving and receiving gifts creates a relationship that can be seen to influence judgments. Therefore, we should always avoid gifts except in the very limited circumstances set out in this Code.
- 2.4 We should also avoid hospitality except in the limited circumstances set out in this Code.
- 2.5 Keeping our personal monies totally separate from Northwards' money and work will avoid problems. Only payments due under employees' contract of employment and expenses can be paid by Northwards.
- 2.6 Our work involves confidential information about our customers and the Company's business, and we must respect that confidentiality.
- 2.7 Northwards' work and reputation relies on us all upholding and promoting the Company's aims and values.
- 2.8 We must ensure that we demonstrate Northwards' non-political nature and keep our personal political activities totally separate from Northwards' work. Employees must declare outside paid work and we must all disclose membership of any secret societies of which we are members.

- 2.9 We must avoid suspicion of preferential treatment of suppliers by separating our private purchasing from Northwards' wherever possible.
- 2.10 Board and Committee meetings must be conducted in a polite and business-like way.
- 2.11 Members carry special responsibilities for accountability, and their conduct and integrity must always be beyond reproach.

3 Details relating to the Code

3.1 Disclosure of Interest

To show that we do not get improper personal benefits because of Northwards' activities, we must sign a 'Disclosure of Interest' annually. Changes of circumstances should be notified as they occur.

Employees and Board Members are required to sign a Disclosure of Interest before taking up their duties. This covers any circumstances where the individual or a close relative could in theory receive a personal or business benefit (other than salary and expenses) as a consequence of any Northwards activity.

There are two main cases where a benefit could occur:

- (i) *a Duality of Interest*: this is where the circumstances potentially could bring about some personal or business gain;
- (ii) *a Conflict of Interest*: this is where a Northwards interest and a personal/business interest actually occurs.

Both types of interest must be disclosed.

Such interests could include the following:

- (a) an interest in any property being purchased by the Company;
- (b) an interest in any company selling or being an agent for any property being purchased by the Company;
- (c) a business relationship with any person or firm earning fees from work placed by the Company;
- (d) a business relationship with any person or firm entering into a contract to carry out work for the Company.

The interests listed in (a) to (d) above do not provide an exhaustive list of the interests which must be disclosed. Any other personal or business interest which conflicts with the Company's interest must be disclosed through the

process outlined above. Where there is doubt as to whether or not a conflict of interest arises the Chair of the Board, Chief Executive or line manager (as applicable) should be approached for advice on how to proceed.

Disclosure of an interest will be held in a register by the Company Secretary which will be open to public scrutiny.

3.2 Relationships with Residents

We must be especially careful of relationships with residents, and never allow any personal relationship with a resident to conflict with their best interests by bringing undue pressure to bear in matters concerning their rights as a resident.

Employees and members must therefore never allow themselves to be compromised by, nor take advantage of, their relationship with residents. The relationship of trust must never be abused.

Employees and members must not invite or influence a resident to make a will or trust under which any employee or any member is named as executor, trustee or beneficiary. If handling a resident's money, which must be avoided wherever possible, we must take extreme care including receipting every transaction.

Employees will be expected to sign a declaration of interest form detailing any relationship with tenants, leaseholders and applicants, which will be held on their personal file.

3.3 Gifts

Giving and receiving gifts from customers, consultants or contractors creates a relationship that can be seen to influence Northwards' judgments. Therefore, we should always avoid gifts except in the very limited circumstances below.

- (a) personal gifts must not be solicited under any circumstances;
- (b) gifts of cash should not be accepted under any circumstances;
- (c) anyone offering gifts should be asked to donate them for residents' benefit or Northwards' charitable donations fund.

How to deal with the exceptions:

- (d) only small personal gifts (e.g., diaries, calendars, and stationery) may be accepted;
- (e) any other gifts received should be pooled and used for residents or other charitable benefit (e.g., directly or by sale or raffle). No personal benefit

to individuals or employees are permitted;

- (f) all gifts received must be recorded in a Register held at Head Office by the Company Secretary, with the exception of those outlined in section (d) above;
- (g) modest gifts to another individual or organisation are only to be made in exceptional circumstances, with the approval of a Director.

It is particularly important that employees should not accept gifts of value from residents or potential residents, although birthday cards, or a small gift of a modest value to an employee who is leaving, may be accepted.

For clarity a “modest gift” would be to a maximum value of £25.00.

3.4 Hospitality

We should also avoid hospitality except in the limited circumstances below.

Employees and members may not solicit hospitality and may not give to or receive repeated or lavish hospitality from representatives of any other organisation. Occasional and modest hospitality will be allowed, but only with a manager’s approval. Any exception must have approval from a Director or Chief Executive. Hospitality must always be recorded in the register held at Head Office by the Company Secretary.

Business meals are permissible but must be approved by your line manager, Chief Executive or Board Chair as appropriate and must be recorded in the hospitality book.

This will be monitored by the Chief Executive regularly and submitted to Board bi-annually for approval.

3.5 Permitted Payments

The following are permitted:

- (a) payments made or benefits granted to an officer or employee under their contract of employment with the company;
- (b) the payment of expenses to a member (including a co-opted member) or to an officer of the company who does not have a contract of employment with the company.

3.6 Provision of Housing

Northwards Lettings Policy is designed to ensure that Manchester City Council (and any relevant organisation) is transparent and equitable when letting homes to employees, members or Co-optees and their relatives. We must not gain any advantage or any preferential treatment in the course of an application for housing. Therefore, the Lettings procedure must be undertaken to ensure that any letting can be subject to a high level of scrutiny.

3.7 Financial Grants and Loans

Keeping our personal monies totally separate from Northwards' money and work will avoid problems. Only normal salary and expenses can be paid by Northwards.

Employees and members may not receive any payment, grant or loan from any funds associated with Northwards except under their contracts of employment or reimbursement of expenses under current procedures and rates.

We may not receive loans from residents, and may not give loans from their personal money to employees, members or residents. This issue will normally relate to 'care' situations.

We may not in any way involve or mix our personal money with Northwards funds except in an emergency. In such cases, our manager should be notified at the earliest possible occasion.

3.8 Confidentiality and 'Whistle blowing'

Our work involves confidential information about our customers and the Company's business, and we must respect that confidentiality.

Northwards is committed to working openly. With the obvious exception of personal information, we will make our business confidential only where this cannot be avoided. Indeed, it is Northwards' policy to publish a wide range of performance information.

Where it is essential that information is released, it must be with the express consent of the individual concerned, except in meeting overriding legal requirements. The Chair of the Board, Chief Executive or line manager (as applicable) must be consulted and agree.

Employees or members who become aware of any breach of this Code or other procedures or any impropriety have a duty to draw this to attention. Employees should report their concerns to their manager or to any of the executive directors if they believe this to be more appropriate. Members should contact the Chair or Chief Executive

In matters of serious concern or sensitivity, Board members have the right to take reasonable, independent legal advice at Northwards' expense. Employees may discuss any such serious concerns with their trade union representative. Northwards Whistle Blowing Policy describes the process for employees.

In no circumstances will any employees or member raising legitimate concerns by following these procedures be penalised in any way for doing so. Equally, abusing this process by raising unfounded or malicious allegations is a serious disciplinary matter.

3.9 Northwards' Aims and Values

Northwards' work and reputation relies on values and us all upholding and promoting the Company's aims.

All parts of the Company should work to the same aims and uphold the same values. Therefore the Board will publish these in its handbooks and newsletters and in other ways. Employees and members are required to incorporate these in their conduct in relation to Northwards.

No employee or Board member shall represent Northwards in interviews or articles with the media, unless the specific permission of the Chief Executive, Director, Chair or Vice Chair of the Board has been given.

3.10 Outside Activities

(a) Political activities

Northwards' work may take the Company into the political arena but we must ensure that we demonstrate its non-political nature and we must keep our personal political activities totally separate from Northwards' work.

Employees and members may well be involved, in their private lives, in political activity. At the same time we must be aware that the Company is non-political. We must ensure that Northwards itself cannot be brought into the political arena or its reputation or status damaged by our personal political activities. When making any political representation, Northwards must clearly be seen to represent a balanced case in support of the Company's key objective – 'to provide the community with affordable, quality homes in a pleasant environment, now and in the future.'

(b) Other activities

All employees must obtain written consent from their Director to take any

outside paid employment. No outside work of any sort may be conducted on Northwards' premises. If we are offered payment for writing or speaking on Northwards related business, any sums earned must be paid to Northwards or donated to a charity approved by the Chief Executive.

Employees should make a Disclosure of Interest if they are a member of any organisation not open to the public which has secrecy about its rules or conduct. A lodge, chapter, society, trust, gathering or meeting is considered as a secret society unless it forms part of the activity of a generally recognised religion.

Non directly employed people, such as agency temps are expected to comply with this code of conduct.

3.11 Equal Opportunities

Northwards is committed to achieving equality of opportunity in every area of its work. Our aim is that everyone should be treated fairly.

Employees and members should be aware of the Company's Equal Opportunities policy. We should be aware also of the scope for discrimination in the granting of tenancies, contracts of employment, and contracts for goods or services. Employees and members must follow established procedures when involved with such issues, to prevent either direct or indirect discrimination from occurring.

The Company monitors the age, gender, gender identity, race or ethnicity, religion or belief and sexual orientation profile of employees and members and of households seeking and receiving accommodation. Employees and members are encouraged to supply this information; the aim is to ensure Northwards reflects the communities it serves.

3.12 Purchasing

We must avoid suspicion of preferential treatment of suppliers by separating our private purchasing from Northwards'.

In order to avoid any suspicion that a supplier may give or receive favourable treatment, employees and members must try to achieve separation between their purchasing decisions as individuals and those for Northwards. There are more stringent rules for those who are in decision-making positions.

- (a) As a general rule, member, directors and senior managers may not normally use for personal or private business any of Northwards' professional advisors, consultants, contractors or suppliers of goods or services (except monopolies, or near monopolies, such as utilities, eg, gas, water). Where this is unavoidable, Directors and Managers must

obtain the consent of the Company Secretary, whilst the Chief Executive, Company Secretary and members must obtain the approval of the Chair confirming that no financial advantage will be secured as a result of their relationship with Northwards.

The Bribery Act criminalizes the paying and receiving of bribes and it is a corporate offence to fail to prevent bribery being undertaken on its behalf. Employees and members are required to act within Northwards corruption compliance policy. This will be regularly monitored. Third parties will be regularly reviewed for compliance.

- (b) Other employees must obtain approval from their Manager before using any of the suppliers or advisors in (a) above. Any such approval should be recorded in their personnel file.
- (c) Where Northwards negotiates a company wide benefit from suppliers, contractors, other services employees and members may use these facilities within the framework agreed,

3.13 Conduct at Board, Committee and Other Meetings

Members and employees present at a meeting which is discussing any item which poses a conflict of interest should declare the interest. If the conflict is clear and substantial, they should leave the meeting.

As in all of our dealings with each other, meetings of the Board, Committee and Area Panels should be polite and business-like:

- at all meetings, the Chair will preside over the proceedings;
- swear words, discriminatory remarks or disruptive behaviour must never be used;
- abuse of employees or members will not be tolerated.

Northwards Dignity at work policy will apply in all cases.

3.14 Special Provisions for Board Members and Co-optees

Board Members and Co-optees carry special duties of accountability and, as a consequence, their conduct and personal integrity must always be beyond reproach. For this reason, any member who:

- becomes subject to legal proceedings brought against him/her by Northwards; or
- brings legal proceedings against Northwards; or

- becomes subject to any criminal or civil proceedings, the nature of which could compromise his/her position as a member;

shall immediately become suspended from membership of the Board, or Sub-Committee upon which they serve. Upon the conclusion of any such proceedings, the Board will decide whether to reinstate or seek removal of a Board member in accordance with the Company's rules. In the case of Co-opted members who are not also Board members, the decision to reinstate or dismiss will be determined by resolution of the Board.

3.16 General

In all cases where employees or members' personal conduct might be viewed as conflicting with their work for Northwards, they are required to disclose details to their Director, the Chief Executive or the Chair as appropriate, and enter details in the register held at head office. Advice on any matter in this Code of Conduct may be sought first from the Director in their own Area/or from the Company Secretary or Chief Executive.

In any case of uncertainty, employees and members should always make an entry in the 'Disclosure of Interest Register'.

The Code of Conduct applies equally to employees and members

All employees and members should carry out their responsibilities in accordance with the Company's policies and procedures.

All employees and members who represent the Company are expected to dress and conduct themselves appropriately for the duty or function that they are carrying out or attending.

3.17 Failure to Follow Code of Conduct

Employees and members should recognise that failure to follow this Code of Conduct may damage Northwards and its work and so will normally be viewed as a disciplinary matter. For employees, such matters will be dealt with under normal disciplinary procedures. For Board and Sub-Committee members, action will be considered in accordance with the Company's rules.

NORTHWARDS HOUSING LIMITED

BOARD MEMBER CODE OF CONDUCT

As a Board Member of Northwards Housing Limited (“the Company”), I acknowledge the contents of the Company’s Code of Conduct and agree:

1. To declare all my interests be they employment, positions of responsibility, membership of Registered Social Landlords, directorships and any financial interest that may relate to the work of the Company.
2. Not to receive any financial remuneration whatsoever for my work other than reasonable travelling and out of pocket expenses properly incurred in the business of the Company.
3. To ensure that any private or personal financial interest will never influence my decisions and that I will never use my position as a Board Member of the Company’s Board for personal gain of any kind.
4. To disclose any direct or indirect pecuniary interest or other non-pecuniary interest in any contracts of business to be considered by the Board of the Company which could influence my judgement, and if requested by the other Board Members, to withdraw from the meeting during consideration and discussion of the business.
5. Not to disclose any confidential information relating to the business, policy, organisation, management, future plans, clients, tenants and staffing of the Company to which I have access. Furthermore, I undertake not to part with possession of or to reproduce any of the Company’s correspondence, documentation or internal memoranda for the benefit of the third parties without the express permission of the Board.
6. Not to accept gifts, other than those of a trivial nature, nor to receive or offer in the name of the Company excessive or extravagant hospitality.
7. Not, without first raising the matter with the Board, use the services of a consultant, contractor, personal advisor or other individual or firm who works for the Company.

Signed _____

Date_____.

Print Name _____

NORTHWARDS HOUSING LIMITED

EMPLOYEE CODE OF CONDUCT

As an employee of Northwards Housing Limited (“the Company”), I acknowledge the contents of the Company’s Code of Conduct and agree:

1. To declare all my interests be they employment, positions of responsibility, membership of Registered Social Landlords, directorships and any financial interest that may relate to the work of the Company.
2. No other payments are permitted other than salary and expenses granted under their contract of employment.
3. To ensure that any private or personal financial interest will never influence my decisions and that I will never use my position for personal gain of any kind.
4. To disclose any direct or indirect pecuniary interest or other non-pecuniary interest in any contracts of business to be considered by Northwards which could influence my judgement.
5. Not to disclose any confidential information relating to the business, policy, organisation, management, future plans, clients, tenants and staffing of the Company to which I have access. Furthermore, I undertake not to part with possession of or to reproduce any of the Company’s correspondence, documentation or internal memoranda for the benefit of the third parties without the express permission of the, Line Manager, Director or Chief Executive.
6. Not to accept gifts, other than those of a trivial nature, nor to receive or offer in the name of the Company excessive or extravagant hospitality.
7. Not, without first raising the matter with the Line Manager, Director or Chief Executive, use the services of a consultant, contractor, personal advisor or other individual or firm who works for the Company.

Signed _____

Date_____.

Print Name _____

NORTHWARDS HOUSING LIMITED (“the Company”)

DISCLOSURE OF INTERESTS

You are required under the Company’s Code of Conduct and Memorandum and Articles of Association to ensure that the Company has at all times an up to date list of:-

- (1) all bodies trading in which you have an interest as:
 - (a) a director or senior employee,
 - (b) a member of a firm (such as a partner or part owner of a business),
 - (c) the owner or controller of more than 2% of the issued share capital in a company,
- (2) all interests you have as an official or elected member of any statutory body;
- (3) all interests your have as the occupier of any property owned or managed by the Company;
- (4) any other significant or material interest.

This requirement also applies to your close relatives and any businesses in which they have a significant interest. Close relative includes your husband, wife, partner, parents, grandparents, children, grandchildren, brothers and sisters and includes similar relations by marriage (i.e. “in laws”). Please provide similar details for each close relative where they hold such a position.

Please complete the declaration on the attached form.

If you have any queries in relation to execution of this form please refer them to the Chief Executive or your line manager.

DIRECT INTERESTS

Name	
Name of Company, Firm, Business or Statutory Body	
Name of Relationship/Interest in that Company, Firm, Business or Statutory Body (e.g. director, senior employee, job title please, or Councillor/officer of a local authority)	
Are you aware of any dealing between the Council or the ALMO and this organisation in the last 12 months? Or any proposed dealings involving the ALMO? If so, please provide details:	

CLOSE RELATIVE'S INTERESTS

Name	
Name of close relative	
Nature of relationship (i.e. brother, etc.)	
Name of company, firm, business or statutory body	
Nature of relationship/interest by the close relative in that company, firm, business or statutory body (e.g. director, partner, part owner, etc.)	
Are you aware of any dealing between the Council or the ALMO and this organisation in the last 12 months? Or any proposed dealings involving the ALMO? If so, please provide details:	

Signed _____ Date _____

Print Name _____