

2024

Code of conduct



L&Q

Our code for board members,
staff and involved residents

An introduction by L&Q's Chief Executive



The National Housing Federation (NHF) requires that members adopt and ensure compliance with a code of conduct for board members, staff and involved residents to uphold the highest standards of probity and conduct, and conduct.

It is vital for the reputation of social housing that everyone who works for, or represents, a housing association is held to the highest standards of conduct. This code sets standards appropriate for housing associations, such as London & Quadrant Housing Trust (L&Q), that are members of the National Housing Federation.

L&Q welcomes the new, refreshed code, and takes this opportunity to restate its commitment to our five values. These values underpin who we are and what we do, wherever we are. This L&Q code of conduct represents a summary of the principles and standards of conduct we expect of all employees, board members and our involved residents. By complying with the code and demonstrating L&Q's values in our everyday work, we will ensure that we work to the highest standards, work co-operatively as a team, and we will lay the foundations that will enable L&Q to achieve its core objective – to enable better lives through creating better places to live.

Fiona Fletcher-Smith
Group Chief Executive

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Introduction

Our values

Our five core values underpin all that we do:

Our values

 People We care about the happiness and well-being of our customers and employees	 Passion We approach everything with energy, determination and enthusiasm	 Inclusion We draw strength from our differences and work collaboratively	 Responsibility We own problems and deliver effective lasting solutions	 Impact We measure what we do by the difference we make
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Code of conduct

While your conduct is expected to reflect L&Q's values, this code goes further by setting out agreed, effective, specific conduct required of all individuals directly involved in delivering L&Q's business activities. It will ensure that we engage with each other in a professional manner, with dignity and respect, showing integrity and avoiding any suggestion of influence by biased or improper motives.

Except where otherwise indicated, the code applies equally to board members, staff and involved residents within the L&Q Group (referred collectively as L&Q) – this includes members of Group Board and the board of L&Q Living Limited, Board committee members and Resident Services Board. References to L&Q apply to all subsidiaries of the L&Q Group.

A copy of the code will be provided to all staff, board and committee members and involved residents. You must familiarise yourself with the contents and act in accordance with its principles and provisions at all times. Breaches of the code are always taken seriously. Failure to comply with the code may be an employment or governance disciplinary matter.

The code cannot cover every situation you may face in your everyday role at L&Q. You may find yourself faced with difficult situations or faced with an unexpected dilemma. If board members or involved residents have any doubts or questions regarding the application of the code, or in relation to a specific issue, they should seek advice and guidance from the Company Secretary. Members of staff should seek advice and guidance, where appropriate, from:

- Their line manager
- The Human Resources Department, or
- The Company Secretary.

The code is consistent with the seven Principles of Public Life (see appendix 1). Although housing associations such as L&Q are not public bodies, the provision of social housing is a public function and L&Q recognises the need to uphold the same principles of selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

Associated policies and procedures

The code of conduct should be read in conjunction with the L&Q Group's policies and procedures which are relevant to your role, and in force in your organisation including:

- The staff handbook
- The health and safety policy
- Standing orders
- Financial regulations
- HR policies
- Staff equality and diversity policy
- Use of IT policies
- The whistle-blowing policy
- The anti-fraud, bribery and corruption policy
- L&Q code of conduct for maintenance contractors
- Safeguarding Adults At Risk policy
- Safeguarding Children policy, and
- Conflicts of Interest policy.

Breach of code

If you believe there has been a breach of the code, you should report the breach to the appropriate party above. Alternatively, you can report a breach under the L&Q whistleblowing policy to any of the contacts listed in the Whistleblowing Policy.

Where you are in doubt about a possible breach of the code, you are encouraged to report your concerns or to seek advice at the level that you feel is important. Anyone who has concerns about misconduct, and reports this in good faith, will have nothing to fear and will be supported by L&Q.



The main principles of the code

The code is split into four main parts, each embodying a key theme arising from the mission and values of housing associations. The four parts of the code are:

Part 1: Acting in the best interests of the housing association and its residents

You have a responsibility to carry out your role in line with the social purposes of the L&Q.

Part 2: Behaving with integrity

The reputation and good name of L&Q depends in part on compliance with this code, and the laws, policies and procedures that it refers to. The integrity of those involved needs to be beyond doubt, and seen so to be.

Part 3: Conducting yourself professionally and treating others well

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

Part 4: Protecting yourself, other people and the environment

You have a responsibility while on the L&Q's business to protect your own health, safety, security and well-being and that of others, and, where reasonable, to make the most positive possible environmental impact.



Part 1: Acting in the best interests of the housing association and its residents

You have a responsibility to discharge your role in line with the purposes and values of the housing association

A Meeting your responsibilities

The principle:

You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of the housing association and for the delivery of its strategic objectives.

Expected of all

- A1.** You must always try to fulfil the requirements of your role to the best of your ability. You must comply with the law, your terms of appointment and L&Q's policies and procedures relating to your role. If any circumstances arise that limit your ability to meet your responsibilities, you must raise this through the appropriate channels.
- A2.** In carrying out your role, you must always seek to further the L&Q's strategic objectives, reflecting our desired culture.
- A3.** You 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.
- A4.** You must consider the impact of your actions on the safety and wellbeing of residents.

Expected of board members

- A5.** You must respect the principle of collective decision-making and corporate responsibility. This means that once the board has made a decision you must support that decision.

- A6.** You must ensure that you declare to L&Q any relevant personal relationships, employment and other appointments you hold, and that these do not interfere with your ability to perform or conflict with your role as a board member. If you take up new employment or appointments during your term of office you must make any necessary declaration of interest in advance.

Expected of staff members

- A7.** You must consult your manager before taking any other paid or voluntary work that may interfere with your existing job, or conflict with terms set out in your contract of employment. Any such work or position must not interfere with your existing job or conflict with the interests of your job or L&Q.
- A8.** You must respect the appropriate channels for handling tenancy and service provision issues. You must not act outside L&Q's established procedures in any matter concerning any resident or other service user.

B Representing the housing association

The principle:

In representing the housing association in any capacity, including at external events, in dealings with outside bodies and on social media, you are an ambassador for the housing association and must uphold and promote its values, objectives and policies.

Expected of all

- B1.** In representing L&Q, you must act in accordance with its values, policies and goals.
- B2.** You must not conduct yourself in a manner that could reasonably be regarded as bringing L&Q into disrepute. This includes membership of, or participation in, activities organised by groups or organisations whose values are inconsistent with L&Q's (for instance, racist organisations) which could create reasonable doubt in your ability to comply with L&Q's values and this code.
- B3.** You must not make derogatory, false or otherwise damaging comments,

in person or through any medium, about L&Q or any person, service or organisation connected with it.

- B4.** You must not seek to officially represent the views or position of L&Q without prior authority.
- B5.** You must adhere to L&Q's policies in the use of email, intranet and internet services including social media. In particular, you must not bring L&Q's name into disrepute or affect its integrity by your actions or words, either within the organisation or outside. This includes the use of, or entries on, social networking sites (such as Facebook, Twitter, YouTube and others). This also applies if you do not name L&Q but where its identity can reasonably be inferred, or where you use a pseudonym, but your identity can reasonably be inferred.
- B6.** When representing L&Q through any medium, including social media, you must at all times act with professionalism.
- B7.** Where any personal social media accounts refer to your role with L&Q, you must make it clear in what capacity you are communicating.
- B8.** If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect L&Q, you must obtain prior consent. Such consent must not be unreasonably withheld unless your activity poses a material risk to the association.

Expected of board members

- B9.** Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or longstanding, and in the opinion of the board cannot be managed appropriately.

Part 2: Behaving with integrity

The reputation and good name of the housing association depends on compliance with this Code, and with the laws, policies and procedures that it refers to. The integrity of those involved needs to be beyond doubt, and seen so to be.

D Conflicts of interests

The principle:

You must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between your duties to the association and your personal interests, other duties and relationships.

Expected of all

- C1.** You must formally declare to L&Q, at the earliest opportunity, any interests which may, or may be perceived to or may in the future, conflict with the duties of your role.
- C2.** You must declare any known relationship to a person applying for or performing a role within the L&Q and must not be involved in their appointment, performance management or reward.
- C3.** You must declare any known relationship to a resident, potential resident or other customer of L&Q. You must not be involved in decisions relating to their relationship with L&Q or seek or accept preferential treatment for them.
- C4.** You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to L&Q and must not be involved in their appointment, performance management or reward.
- C5.** Except where specifically permitted, as set out in any relevant policy, you must avoid using its contractors and suppliers for private purposes. Where this is unavoidable, you must not receive a more favourable service than would be received by other customers as a result of your connection with L&Q. Except in the case of for example large utility companies, prior approval must be sought before using the supplier or contractor and a written declaration made confirming that no financial or other advantage has been secured as a result of the relationship with L&Q.

- C6.** You must not use, or attempt to use, your position to promote personal interests or those of any connected person, business or other organisation for personal gain.

Expected of board members

- C7.** Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or longstanding, and in the opinion of the board cannot be managed appropriately.
- C8.** You must ensure that your entry in L&Q's register of interests is complete, accurate and up to date.

D Bribery, gifts and hospitality

The principle

In your role with the housing association, 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. You must not seek or accept preferential treatment in the provision of benefits such as housing accommodation or employment.

Expected of all

- D1.** You must not solicit or seek gifts or hospitality or other benefits.
- D2.** Any gifts or hospitality offered to or by you must be either declared or declined according to L&Q's policies.
- D3.** If you are offered a bribe, hospitality or a gift, which is or may be in return for expected preferential treatment, you must decline and declare this immediately to the appropriate person.

E Funds, resources and personal benefit

The principle:

You must not misuse the housing association's funds or resources, or seek preferential treatment for your own personal benefit.

Expected of all

- E1.** You must ensure that L&Q's funds and resources are used properly and efficiently. Resources include staff, information, telephone, computer and other IT facilities, equipment, stationery and transport.
- E2.** Your procurement decisions must be guided by L&Q's policies and fairness in decision-making and in line with relevant law.
- E3.** You must take all reasonable measures to protect L&Q's funds, resources, property and assets from fraud, theft, damage and misuse.
- E4.** If you claim reimbursement for any expenses you must do so in line with the L&Q's policies and procedures.
- E5.** You must comply with L&Q's policies and procedures relating to the acceptable or unacceptable use of email, intranet and internet services. Amongst other things, these policies and procedures prohibit access to pornographic or racist material, and the use of unauthorised or unlicensed software.

F Confidentiality

The principle:

You must process information in accordance with the law and the housing association's policies and procedures.

Expected of all

- F1.** You must not disclose, without the required permission and authority, any personal data about tenants, customers, staff or colleagues.
- F2.** You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left L&Q or stepped down from your position.
- F3.** You 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 the L&Q, unless you are doing so in accordance with its whistleblowing policy and procedure.
- F4.** You must not prevent another person from gaining access to information to which they are entitled to by law.

G Reporting concerns

The principle:

You must report to the appropriate person within the association any reasonable suspicions you have about possible wrongdoing in line with your association's relevant policies and procedures.

Expected of all

- G1.** If you have a concern about possible wrongdoing, you 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.
- G2.** If you believe that you are being required to act in a way which conflicts with this Code or legislation, you must immediately report it via the appropriate channel.
- G3.** You must not victimise or disadvantage any person who uses or intends to use the L&Q's confidential reporting (whistleblowing) procedures to report actual or alleged wrongdoing.



Part 3: Conducting yourself professionally and treating others well

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

H Respect for others

The principle:

You must treat all others with respect and consideration.

Expected of all

- H1. You must treat everyone you meet in the performance of your role with equal respect, care and consideration.
- H2. You must show respect for individuals' chosen identities.
- H3. You must promote, through your own behaviours, an organisational culture that is welcoming, accepting and accommodating to people of all backgrounds, cultures and personal and protected characteristics. Equality laws prohibit discrimination on grounds including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation and impose positive duties to eliminate unlawful discrimination and promote equality.
- H4. You must not harass, bully or attempt to intimidate any person, or use threatening or aggressive behaviour or other discriminatory behaviours. You must seek to avoid microaggressions in your speech and behaviour.
- H5. You must not display materials in your workplace or use language in the performance of your role which other people might reasonably find offensive.
- H6. You must report through appropriate channels any instances of unfair or unequal treatment in the workplace and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and respecting confidentiality.
- H7. In representing L&Q at formal or informal events, you must be appropriately dressed for the occasion.

I Working with residents and other customers

The principle:

You must be professional, fair and courteous in all your dealings with residents and other customers.

Expected of all

- I1. You must seek and value views from residents and other customers when making decisions that will affect them.
- I2. You must not allow any personal relationship with a resident or other customer to influence how you discharge your role and responsibilities.
- I3. You must not give personal gifts or loans of money to, or receive personal loans or gifts of money from, residents or other customers.
- I4. You must handle residents' and other customers' money only where absolutely necessary and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with L&Q's financial policies, procedures and controls to ensure appropriate handling of any and all funds.
- I5. You must not invite or influence a resident or other customer unless they are a person who you are closely connected to, to make a will or trust under which you are named as executor, trustee or beneficiary.

J

Professional relationships

The principle:

Board members, staff and involved residents must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.

Expected of all

- J1.** You must not ask or encourage the commitment of wrongdoing, including any breach of this Code.

Expected of Board Members

- J2.** Your relationships with Board staff and involved tenants must be constructive and professional.
- J3.** You must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies and objectives of L&Q.

Expected of Board Members in involved residents

- J4.** Where it is necessary to raise issues of staff, board or contractor performance, these must be raised constructively and through the appropriate channels.
- J5.** You must not undermine or appear to undermine the authority of a senior officer in his or her dealings with a more junior member of staff.
- J6.** You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with members of staff.
- J7.** Unless you have specific and, where practicable, written delegated authority to do so, you must not go beyond your role as a board member and become inappropriately involved in operational matters or individually give instruction or direction to any member of staff or contractor.

Expected of staff members

- J8.** You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding, in a professional setting, inappropriate personal familiarity with board members and involved residents.
- J9.** You must not use informal channels to lobby or influence board members or involved residents on matters of L&Q's business.
- J10.** You must not knowingly mislead the board or any of the housing association's committees or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.
- J11.** You must take great care in handling residents' and other service users' money, ensuring that a receipt is completed for every transaction.

K

Learning and development

The principle:

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

Expected of all

- K1.** You must play an active part in L&Q's supervision and performance appraisal processes as applying to you.
- K2.** You must offer open and constructive feedback to others and invite feedback about your own performance.
- K3.** You must make your personal training and development needs relevant to your role known to L&Q.
- K4.** Unless there are exceptional reasons, you must attend learning and development events as required.

Expected of board members

- K5.** You must keep your knowledge up to date in those areas in which you are a specialist, as well as keeping abreast of any matters relating to L&Q and the wider housing sector.

Part 4: Protecting yourself, other people and the environment

You have a responsibility while on the housing association's business to protect your own health, safety, security and wellbeing and that of others, and to minimise harmful environmental impacts

L Health, safety and security

The principle:

Your conduct, actions and decision making must promote the health, safety, security and wellbeing of yourself or others.

Expected of all

- L1. You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk.
- L2. If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or a group of individuals connected with L&Q, you must report this immediately through the appropriate channels.
- L3. You must comply with your L&Q's health and safety policies and procedures and bring to the attention of the appropriate person any risks to yourself or others. In particular: 1) Where you are provided with protective clothing this must be worn and 2) For your own safety, you must comply with your employer's policy and procedures relating to lone working.
- L4. You must comply with the law and L&Q's policies on smoking and on the use of alcohol, illegal drugs and other substances
- L5. You must comply with your employer's policies relating to the security of premises.
- L6. If responsible for maintaining relationships with maintenance suppliers and contractors you must ensure they are made aware of and work in compliance with the L&Q code of conduct for Maintenance Contractors.

M Protecting the environment

The principle:

Within your role at the association, you must strive to avoid or reduce possible negative environmental impacts.

Expected of all

- M1. In carrying out actions or making decisions in the performance of your role, you must consider the environmental impact of your decisions and where you are able, seek to achieve positive environmental outcomes.

Expected of board members

- M2. You should consider the long-term environmental impact of your decisions.





Appendices

Appendix A – terminology used in the code

Board

Includes any board of management, management committee, board of trustees, and all similar governing bodies however named.

Board member

Includes all members of governing bodies whether they are formally known as non-executive directors, trustees, board members, management committee members, etc. It includes co-optees and any other nominees, whether or not they enjoy voting rights, and all members of sub-committees who are not also members of the main governing body.

Contractors

Includes those other than board members, staff and involved residents who are directly involved in delivering the housing association's business activities. This includes contractors, sub-contractors, consultants and agents.

Housing association

Refers to all organisations that are members of the National Housing Federation. This includes other types of housing organisation – such as charities, co-operatives and companies – that are members of the National Housing Federation.

Involved resident

Includes residents and other customers (as defined below) who are formally involved in delivering, or scrutinising, the housing association's business activities. It will be up to each association to decide which involved residents this Code applies to; we would recommend it only applies to those who exercise a level of seniority within the association, for example, those who attend board or committee meetings or are members of a scrutiny panel. Some involved resident groups may instead operate to their own Code of Conduct.

Known relationship

For the purposes of this code means related parties and close connections, it is not envisaged that relationships with acquaintances should be covered by this term.

Microaggression

Is a term used for brief and commonplace verbal, behavioural or environmental slights that may communicate hostile, derogatory, or negative attitudes towards certain groups of people.

People with whom you are closely connected

In broad terms, means your family, relatives or business partners as well as businesses in which you have an interest through ownership or influence. The term includes your spouse or unmarried partner or civil partner, children, siblings, grandchildren and grandparents.

Residents and other customers

Includes residents, tenants, leaseholders, shared owners and users of other services provided by the housing association.

Staff member and staff

Includes the housing association's employees and any other persons fulfilling the role of a paid employee, such as those deemed to be workers, interim placements, or those on secondment from another organisation.

Appendices

Appendix B – Principles of Public Life

Staff, board members and involved residents will inevitably face situations not directly addressed by the code. In such situations they should be guided by the seven principles of public life established by the Committee on Standards in Public Life.

Although housing associations are not public bodies, there is a general acceptance that those holding positions of leadership in associations which are recipients of public funds should uphold the same values of selflessness, integrity, objectivity, accountability, openness, honesty and leadership. These are defined below.

Selflessness: Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or friends.

Integrity: Holders of public office should not place themselves under any financial or other obligation to outside individual or organisations that might seek to influence them in the performance of their official duties.

Objectivity: In carrying out public business, including making public appointments, awarding contracts or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability: Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness: Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty: Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership: Holders of public office should support and promote these principles by leadership and example.





For more information

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