

Code of Conduct

Contents

Our Code

Introducing our Code of Conduct
Living our values
Your responsibilities
Resident and service user focus and respect
Conduct we will not accept
Resident and service user safety and safeguarding
Whistleblowing – speaking up
Safeguards for employees raising a concern

Our People

Professional competence
Workplace safety
Equality, diversity, and inclusion
Misuse of position and power
Bullying-free and harassment-free workplace
Drugs and alcohol
Prescription or over-the-counter-medication

Our Business

Use of financial resources
Bribery and corruption
Conflicts of interest
Employees who are landlords
Professional boundaries
Personal relationships
Board members and Councillors
Recruiting and managing relatives or personal friends
Gifts, hospitality and entertainment
Additional employment
Expression of opinions
Leadership responsibilities

Our Integrity

Accountability and ownership
Sustainability
Protecting our assets
Use of the Internet and email
Social media use
Confidential information and data protection
The Barnet Group information
Political neutrality
Intellectual property
Inventions and patents
Raising a concern
A final note

Our Code

Introducing our Code of Conduct

Our Code of Conduct has been created to help you understand the behaviours we expect of you and to provide you with guidance and support. Our aim is to develop and support the highest standards of conduct and integrity of our employees, and we expect the highest standards of conduct from all our employees at all times.

This Code supports our commitment to ensuring that employees have, maintain, and demonstrate the skills, knowledge, experience, and behaviours required to deliver safe, effective, respectful, and high-quality services. It forms part of The Barnet Group's arrangements for meeting applicable professional, legal, and regulatory standards, including the Regulator of Social Housing's Competence and Conduct Standard.

Of course, this Code cannot detail the specific behaviour required in every situation, and the relevant policies and procedures should also always be followed, as should any local rules. Throughout this Code you will see "Am I doing the right thing?" sections which give you examples of what to do in specific situations and "Which documents?" sections which tell you which other documents, policies and procedures you need to read, understand and abide by.

This Code applies to all employees and workers across The Barnet Group, including directors, permanent and fixed-term employees, temporary and agency workers, secondees, volunteers, trainees, and apprentices. Contractors and consultants engaged to deliver services on our behalf must comply with equivalent standards of conduct, as specified through their contractual arrangements. References to "employees" in this Code include all individuals within its scope unless the context requires otherwise.

All employees must comply with this Code. You must make the time to read and understand this document. Failure to follow this Code and TBG's policies and procedures may result in breaches of law and regulations and a loss of reputation. For individuals it could also mean disciplinary action and possibly dismissal for employees, action by the employing agency for agency workers, and contractual remedies, removal from duties, or termination of engagement for contractors.

If you're in any doubt about the meaning of any part of this Code, have any questions about it or need advice, please speak to your manager. The policies, procedures, and other documents referred to in this Code can all be found on the intranet.

This Code replaces any previous versions endorsed by TBG and its subsidiaries.

Residents and service users can expect our staff to be professional, knowledgeable, respectful, accountable, and committed to delivering safe, high-quality services. We will listen to residents and service users, learn from feedback, act with integrity, and treat everyone with dignity and respect.

Am I doing the right thing?

Q: Should I follow this Code or the law?

A: First and foremost, you must always comply with the law. This Code will usually be stricter than the law requires, in which case you will follow the Code

Which documents should I read?

TBG Strategic Plan

Living our values

At the heart of our business are TBG's Values, which support our promise to be person-centred in all that we do. These were developed with our employees and set out the way we will conduct ourselves and how we do business:

- **Show respect** – we respect each other and our customers
- **Find solutions** – we find solutions meet people's needs
- **Make a difference** – we make a positive difference to people's lives

These values underpin TBG's expectation that its employees maintain the highest standards of conduct, impartiality and integrity. We must consistently live up to our values so our residents, service users, colleagues and the public are confident they can put their full trust in us.

These values are supported by the behaviours we expect from everyone at The Barnet Group:

We are Humble

We recognise that no one has all the answers. We are open to learning, welcome challenge and feedback, and treat others with respect regardless of role, background, or experience.

This means we:

- listen before acting or responding;
- take responsibility for mistakes and learn from them;
- remain open to feedback and different perspectives;
- recognise the contributions of others; and
- focus on what is best for residents, service users, colleagues, and the organisation rather than personal recognition.

We are Hungry

We are ambitious for our residents, service users, communities, and colleagues. We strive for continuous improvement and take ownership for delivering high-quality services.

This means we:

- look for better ways of doing things;
- take initiative and follow through on commitments;
- seek opportunities to develop our knowledge, skills, and experience;
- learn from complaints, feedback, and performance information; and
- focus on achieving positive outcomes and making a meaningful difference.

We are People Smart

We build positive relationships and work effectively with others. We communicate openly, act with empathy, and understand the impact of our behaviour on those around us.

This means we:

- communicate clearly, honestly, and respectfully;
- build trust through our actions and behaviours;
- work collaboratively across teams and services;
- adapt our approach to meet different needs; and
- handle difficult conversations professionally and constructively.

Your responsibilities

Everyone in TBG has responsibility for:

- adhering to this Code of Conduct
- behaving respectfully towards their colleagues, managers, customers and the public and in line with our values
- promoting and role-modelling good ethical behaviour and conduct including complying with all laws and regulations
- ensuring they have access to, read, understand and follow this Code and the policies, procedures and documents referred to within as well as all local rules and seeking clarification from their line manager if they are unclear about any aspect of any of these
- promoting an environment in which your colleagues feel confident and able to raise ethical concerns and that they are taken seriously
- completing a Declaration of Interests form annually (more on this later) and declaring any other relevant, or potentially relevant, interests as they occur
- reporting any breaches of procedure or any impropriety or any other concerns relating to this code to their manager, senior manager or the HR team

Managers are also responsible for:

- ensuring that their teams are aware of this Code and the policies, procedures and documents referred to within, as well as local rules, and how to apply them during their everyday work life
- enabling employees to raise any concerns without fear of recrimination.

Human Resources is also responsible for:

- Supporting employees and managers in implementing this Code and the policies, procedures and documents referred to within, as well as all local rules, and in addressing any concerns.

Resident and service user focus and respect

You should always remember your responsibilities to the communities we serve. Employees must place residents, service users, and customers at the centre of decision-making and service delivery.

You should always:

- treat all residents and service users with dignity, courtesy, empathy, and respect;
- actively listen to concerns and experiences;
- communicate clearly, honestly, and in plain language, including keeping residents and service users informed about progress;
- meet commitments and timescales wherever possible;
- avoid dismissive, discriminatory, prejudicial, or stigmatising attitudes;
- take ownership of enquiries and agreed actions, or ensure that these are transferred clearly to an appropriate person;
- recognise the diversity of residents and service users and tailor services appropriately; and
- demonstrate a commitment to excellent customer service, even in challenging situations.

You should exercise appropriate professional curiosity, consider the information available to you, and avoid making unsupported assumptions about residents or service users. Where information indicates a potential risk, vulnerability, safeguarding concern, or service failure, you should make appropriate enquiries and escalate the matter.

Employees must recognise that every interaction contributes to public trust in the organisation and the wider social housing and adult social care sectors.

Which documents should I read?

Equality, Diversity, and Inclusion Policy

Ask your manager to provide you with all the rules and procedures which are specific to your local workplace and role

Conduct we will not accept

Some behaviours are fundamentally inconsistent with our values, this Code, and the trust placed in us by residents, service users, colleagues, and the public. We will not tolerate:

- Unsafe, illegal or unethical working practices
- Violence, aggression, or ethical behaviour;
- Discrimination, bullying, harassment, or victimisation;
- Fraud, bribery, corruption, or other dishonest conduct; or
- Retaliation against anyone who raises a concern, reports wrongdoing, or speaks up in good faith.

Concerns will be considered fairly, objectively, and in accordance with the relevant policy or procedure. Any action taken will be appropriate and proportionate to the circumstances, seriousness, evidence, and risks involved.

Conduct that amounts to misconduct or gross misconduct will be addressed under the Disciplinary Policy and Procedure and may result in disciplinary action, including dismissal. Gross misconduct may result in dismissal without notice or payment in lieu of notice.

Which documents should I read?

Disciplinary Policy and Procedure

Anti-Bullying and Harassment Policy

Anti-Racism Policy

Resident and service user safety and safeguarding

The safety and wellbeing of residents and service users must be prioritised at all times.

You have a duty to:

- comply with all health and safety requirements;
- report concerns relating to resident safety immediately;
- cooperate fully with investigations; and
- never knowingly ignore risks that could affect residents, colleagues, contractors, or the public.

The Barnet Group does not tolerate the abuse and/or neglect of children, young people, or adults at risk and you also have a safeguarding duty to:

- understand and fulfil safeguarding responsibilities;
- prevent abuse or neglect from happening wherever possible
- respond promptly and proportionately where abuse does happen
- make the necessary referrals and engage the appropriate authorities to stop the abuse and ensure the person harmed receives effective support

You must report and/or act on any concerns of abuse or neglect, even if you do not have proof, and must ensure you are familiar with and abide by the Safeguarding Policy and Procedure.

Whistleblowing – speaking up

Whistleblowing is the reporting of suspected wrongdoing at work by the organisation, an employee, a supplier or any other business partner. You have a responsibility to raise concerns where you believe standards are not being met.

If you suspect dangerous, illegal, harmful or fraudulent activity is taking place, has taken place or is likely to take place, you should consult TBG Whistleblowing Policy for details of who to report your concerns to. The policy exists to reassure you that it is safe and acceptable to speak up, and you should raise any concerns as soon as they arise, you don't need to wait for proof.

The Whistleblowing Policy is primarily for concerns where, due to malpractice, fraud, abuse, or other inappropriate acts / omissions, the interest of others or the organisation itself is at risk, such as:

- a criminal offence
- the breach of a legal obligation
- a miscarriage of justice
- a danger to the health and safety of an individual
- safeguarding
- misconduct
- unethical behaviour
- fraud or corruption
- discrimination
- damage to the environment
- deliberate covering up of and/or failing to report information tending to show any of the above matters.

You may be worried about raising a concern and feel it's none of your business or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the organisation. To work out the right thing to do in any situation, ask yourself:

- is it legal?
- is it ethical?
- does it comply with The Barnet Group's policies?
- would I be happy telling my colleagues, family and friends about it?

If the answer to any of these is 'no' then we expect you to speak up!

Safeguards for employees raising a concern

We recognise that the decision to report malpractice can be a difficult one for an employee, who may possibly fear subsequent victimisation or harassment.

No action will be taken against an employee who has raised a concern in good faith (i.e. honestly), even if that concern is seen to be unfounded after investigation. Victimisation or harassment of an employee who has raised a concern in good faith, or any other attempt at reprisal either by an employee whose conduct is the subject of investigation or others, will not be tolerated by the Group. We will take appropriate steps to protect employees, including, where appropriate, disciplinary action.

Am I doing the right thing?

Q: Could I be penalised or treated differently if I whistleblow?

A: The Barnet Group has a responsibility to protect you against being penalised or treated

differently for whistleblowing. If you suspect wrongdoing you should always report it, even if you don't have proof. If you experience any retaliation or harassment which you suspect is a result of your whistleblowing, we will investigate and take appropriate action against the harasser, in accordance with our HR policies and procedures.

Which documents should I read?

Whistleblowing Policy
Counter-Fraud, Bribery and Corruption Policy
Whistleblowing Procedure and Fraud Response Plan

Our people

Professional competence

Employees are responsible for maintaining the knowledge, skills, qualifications, and behaviours necessary to perform their role effectively and safely.

Employees will:

- participate in required learning and development activities;
- demonstrate their competence through their work, supervision, appraisal, assessment, and any other reasonable assurance arrangements relevant to their role;
- maintain any professional memberships, registrations, licences, or qualifications relevant to their role and provide accurate information about this;
- keep their knowledge up to date;
- apply learning in practice and share relevant learning with colleagues;
- engage openly and constructively in appraisal, supervision, and performance review processes;
- seek support where they do not feel sufficiently skilled or competent to undertake a task; and
- only undertake activities for which they are appropriately trained and authorised.

Workplace safety

We work to ensure we provide a safe workplace and expect all our employees to play their part in making The Barnet Group safer and ensuring their team has the right equipment, training and knowledge to create a safe working environment.

You must not undertake work that you reasonably believe is unsafe, unlawful, outside your competence or authority, or inconsistent with professional or regulatory requirements. You must pause the activity where it is safe to do so, seek advice, and escalate the matter promptly to your manager.

If you have any health and safety concerns about your own work or work environment, or that of your colleagues, please speak to an appropriate manager immediately.

Am I doing the right thing?

- Ensure you know who the first aiders are for the building/s you work in
- Familiarise yourself with the fire exits, fire alarms, emergency evacuation procedures and fire extinguishers for the building/s you work in
- Be aware of the hazards associated with the work you are doing
- Look out for your own safety and that of others around you
- Report any accident, near miss, ill-health or unsafe condition so appropriate action can be taken

- | |
|--|
| <ul style="list-style-type: none">• Ensure you have the correct equipment and are properly trained for the work you are doing. |
|--|

Which documents should I read?

Health and Safety Policy Fire Safety Policy Local rules and procedures specific to your role and workplace
--

Equality, diversity, and inclusion

We promote a diverse, inclusive and equal workplace. For everyone you have contact with, both within the organisation and externally, you have a duty to:

- treat individuals fairly and without discrimination;
- challenge inappropriate behaviour where it occurs;
- respect individual differences, experiences, and identities;
- consider the needs of residents and service users who may be vulnerable; and
- support an inclusive and respectful organisational culture.

Age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation are not relevant to how we treat each other. We hire, promote and reward our employees based on their capabilities and skills, and employment and service decisions must be fair, objective, evidence-based, and consistent with our equality considerations.

Our employees have the right to work in a safe environment free from discrimination, bullying or harassment.

We support and uphold human rights principles and international standards. We will not engage in, support or tolerate, the use of forced or child labour.

If you experience or suspect any behaviour which contravenes this you should always report it to an appropriate manager or to the HR team.

Which documents should I read?

Equality, Diversity and Inclusion Policy Anti-Bullying and Harassment Policy Anti-Racism Policy Vulnerable Tenants Policy Grievance Policy and Procedures

Misuse of position and power

You should be mindful of the power you may have by virtue of your role or for any other reason and you must be responsible in the use of any such power. Power can be held by individuals and groups and can come from status (for example, holding a management position) as well as from age, length of service, physical strength, social popularity, strength of a group, relationship with customer or contractor etc.

You must not, for example, bully, unnecessarily exclude someone from conversation or from full participation at work, restrict work opportunities, deny development opportunities, or victimise someone for challenging actions or behaviour which they feel is inappropriate.

Anyone who experiences behaviour from others which they feel is unpleasant, disrespectful or threatening should discuss this with an appropriate manager or the HR team.

Am I doing the right thing?

Q: My colleague is becoming increasingly hostile towards another member of the team. I feel that other team members are beginning to follow their lead. What should I do?

A: Raise your concern with your manager or with one of the Senior Officers mentioned in the Whistleblowing Policy available on the intranet. Alternatively, you can discuss this with a member of the HR team.

Bullying-free and harassment-free workplace

What is bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour, or an abuse or misuse of power, that has the purpose or effect of undermining, humiliating, denigrating, or injuring another person.

What is harassment?

Harassment is unwanted conduct or physical contact, which has the purpose or effect of violating another's dignity or creating an intimidating, hostile, humiliating, degrading or offensive environment.

It does not cover behaviour which is mutually acceptable, but rather behaviour which is unsolicited, personally offensive and not reciprocated.

Conduct may be viewed as harassment whether or not it is intended to. Something one person sees as a 'joke' may offend someone else. Different people find different things acceptable. Everyone has a right to decide what behaviour is acceptable and to have their feelings respected by others. You have a personal responsibility to behave in a manner that is not offensive to others.

If you experience any form of bullying or harassment or you suspect it has taken, or is taking place, you must report it in line with The Barnet Group Bullying and Harassment Policy and Procedure. Complaints of bullying and harassment will be taken seriously and will be investigated.

Am I doing the right thing?

Q: Does harassment need to be physical?

A: Absolutely not. Harassment can also be verbal and non-verbal. Words and gestures can be just as offensive as physical acts. Jokes, obscene gestures, sarcastic remarks, suggestive or insulting sounds, stories or racial comments can be classed as harassment and can create a hostile working environment.

Which documents should I read?

Bullying and Harassment Policy
Anti-Racism Policy

Drugs and alcohol

The Barnet Group is a drug-free and alcohol-free workplace. The abuse of drugs or other substances and the consumption of alcohol will have an adverse effect on an employee's health, performance and attendance at work. It may have an adverse effect on the quality of the service and care given to the people who we support and present unacceptable health, safety and welfare risks. It may also lead to the breakdown of relationships and morale within teams.

While at work and attending business-related activities in any location you are strictly prohibited from using or being under the influence of alcohol or drugs. All employees have a responsibility to ensure they are fit for work and able to perform their duties unimpaired by alcohol or drugs. Employees must be aware that drug or alcohol use outside work can affect their ability at work (including at the start of their working day, after lunch time and after breaks).

We expect employees to seek help if they have a problem with alcohol or drugs. We recognise that drug and alcohol misuse is an illness, and we will aim to support employees who come to us with a problem and who are willing to work with us to deal with it. Any employee who feels that they are having a problem with drug or alcohol use should seek help through their line manager, or the HR team. This will be dealt with in strict confidence.

From time to time The Barnet Group may organise events where alcohol is served. You are always expected to drink responsibly at these events.

Prescription or over-the-counter medication

If you are taking prescription or over-the-counter medication, which may potentially compromise your ability to carry out your work safely and effectively, for example if it may cause drowsiness, we expect you to inform your manager and we will work with you to try to find an appropriate solution.

Our business

Use of financial resources

You must ensure that you use public funds entrusted to TBG in a responsible and lawful manner. You should strive to ensure value for money to the local community and to avoid any legal challenge to TBG.

Bribery and corruption

TBG will not tolerate fraud, corruption, bribery, and/or money-laundering within or against the organisation. We do not offer or accept bribes or improper inducements, to secure business or to gain any advantage for either the organisation or for any individual.

A bribe might be cash, a gift, or other inducement to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party, or a private person or company.

All employees must familiarise themselves with the Counter-Fraud, Bribery, and Corruption Policy. Employees must take all reasonable steps to ensure everyone they work with complies with this legislation and policy and must report any concerns or suspicions they have about malpractice using the Whistleblowing Policy.

Conflicts of interest

We aim to avoid conflicts of interest whether financial, non-financial, personal interests or conflicts of loyalty. You should always act in the best interests of The Barnet Group. Conflicts of interest may arise when your personal, family or other business interests could conflict, or appear to conflict, with The Barnet Group's interests. Even the perception of a conflict of interest can damage our reputation.

Interests, relationships and associations must be declared when dealing with contracts, recruitment, management responsibilities, the allocation of resources and services, the provision of services, and access to confidential information e.g. it would be improper for any officer responsible for administering grants to be a private member of any organisation in receipt of a grant from The Barnet Group or the Council.

You should also declare membership of any organisation not open to the public with formal membership and commitment of allegiance or which has secrecy about rules or membership or conduct e.g. Freemasons.

You should also declare if you live in a property that is owned and/or managed by The Barnet Group (more on this later).

You are required to report situations where there may be a potential conflict of interest and when you join The Barnet Group you need to complete, sign and submit a Declaration of Interests form via iTrent. You are then responsible for promptly updating the Declaration of Interests form as and when any material change occurs and annually even if no changes have occurred. Completed forms will be reviewed by your manager before being submitted and they are included in a confidential register and are available for inspection by the Executive Directors. Declaration of Interest forms may be accessed during investigations if the conduct of an employee is brought into question.

Additionally, you should always advise your manager of any potential conflict of interest and excuse yourself from any decision-making process which could conflict, or be seen to conflict, with your personal interests.

The Counter-Fraud, Bribery, and Corruption Policy gives some examples of Conflicts of Interest and explains what happens where there is a potential conflict.

Employees who are landlords

Employees who are landlords and intend to rent a property through Housing Options should be aware that this is likely to be a conflict of interest and must disclose this information immediately on the Declaration of Interests form via iTrent.

Which documents should I read?

Counter-Fraud, Bribery, and Corruption Policy Whistleblowing Policy Whistleblowing Procedure and Fraud Response Plan
--

Professional boundaries

Professional boundaries are an integral part of the relationship between staff and customers, and you are expected to act in an open and transparent manner when dealing with residents and service users, and in a manner that would not lead any reasonable person to question your actions or intent.

TBG staff are in a position of trust and have a duty to protect vulnerable customers from discrimination and harm and to maintain appropriate professional boundaries at all times.

If you suspect any wrongdoing, even if you don't have proof, please refer to the Whistleblowing Policy for guidance on who to report it to.

Personal relationships

You must not allow any personal relationship with a resident or other service user or customer to conflict with the conduct of your roles and responsibilities.

The Barnet Group also recognises that employees who work together may form personal friendships, and in some cases close personal relationships. Any employee who is involved in a personal relationship with a colleague must not allow that relationship to influence their conduct while at work, and must behave in an appropriate and professional manner at work.

Which documents should I read?
Safeguarding Policy and Procedure
Whistleblowing Policy
Whistleblowing Procedure and Fraud Response Plan

Board Members and Councillors

Employees are responsible to The Barnet Group through its Executive Team and Senior Managers. For some, their role is to give advice to Board Members, Executive Team, Senior Managers and Councillors and all are there to carry out The Barnet Group work and mutual respect between employees and its leadership is essential.

Close personal familiarity between employees and individual members of the leadership team and Boards must not influence conduct at work. If a close personal relationship exists or is formed this should be declared.

Contractors and suppliers

Orders and contracts must be awarded on merit, by fair competition against tenders and no special favour should be shown to businesses run by, for example, friends, partners or relatives in the tendering process.

All relationships of a business or private nature with external contractors or suppliers, or potential contractors or suppliers, should be declared on a Declaration of Interests form via iTrent.

Recruiting and managing relatives or personal friends

To ensure fair treatment in line with the Equality, Diversity, and Inclusion Policy and the Recruitment and Selection Policy and Procedure, employees involved in recruitment and selection should ensure that all appointments are made on the basis of merit only. It would be unlawful for an employee to make an appointment which was based on anything other than the ability of the candidate to undertake the duties of the post.

Examples of likely conflicts of interest include a person directly involved in any stage of the selection process being related to, or has (or has had) a personal friendship or relationship with an applicant, or has prior knowledge of an applicant outside of the work environment which could in any way affect their decision making.

Likewise, employees should not be involved in any management or Human Resources related processes such as, but not limited to, disciplinary, grievance, promotion or job evaluation which concern an employee who they are related to, or have (or have had) a personal friendship or relationship with.

Where there is a potential conflict of interest, the employee should declare the conflict by submitting a Declaration of Interests form via iTrent and should normally stand down from the entire decision-making process.

Employees who are residents, or related to or personal friends with a resident or service user

If you are a resident as well as an employee you must not use your position as an employee to obtain a service you are not entitled to or for any other personal gain. You must also not use your position on behalf of a colleague, relative or friend.

If you intend to make an application for housing, you must inform your line manager in advance and you should never enquire about the progress of your application, or that of a relative or friend, during work hours. All enquiries and appointments should be made through the same channels and process which apply to all other customers.

You should not use your position to view, access or update data about yourself or someone you know without the prior permission of your line manager. Such data is protected and must not be communicated to a third party.

You should not use your position to view and access data about your friends, relatives or neighbours. You must not report nuisance, order a repair on behalf of a friend, relative or neighbour unless this falls within the employee's duties e.g. you are a customer service officer in the Contact Centre and receive a repair request from a friend, relative or neighbour in the normal course of your duties. You must not adjust records or accounts or influence any specification, variation or decision.

Which documents should I read?
Recruitment and Selection Policy, Procedure and Guidance for Managers Safeguarding Policy and Procedure

Gifts, hospitality and entertainment

You should be aware that it is a serious criminal offence to corruptly receive or give any gift, loan, fee, reward or advantage for doing, or not doing, anything or showing favour, or disfavour, to any person in your official capacity.

Therefore, you should refuse any personal gift offered to you or to a family member by any person or body that has, or seeks to have, dealings with The Barnet Group, including residents and service users. Care should be taken where hospitality, such as drinks, meals, entertainment, overnight accommodation, travel and holidays, are offered to an individual employee. It is important that any suggestion of improper influence should be avoided.

If you receive or are offered a gift, hospitality or entertainment advise your manager immediately and refer to the Counter-Fraud, Bribery, and Corruption Policy. The policy outlines some limited exceptions where certain small gifts, hospitality and entertainment may be accepted. It also explains what you should do if you receive a gift and returning it would cause offence or cost The Barnet Group a disproportionate amount of money.

Giving gifts, hospitality, and entertainment

If you wish to give a gift, hospitality or entertainment to any other party this must be authorised in advance by your manager. Please refer to the Counter-Fraud, Bribery, and Corruption Policy for further details.

Which documents should I read?
Counter-Fraud, Bribery, and Corruption Policy

Additional employment

You must not take up any other employment or engage in any business without the prior written approval of your manager. Any additional employment must not conflict, or be likely to conflict, with the interests of, or weaken public confidence in, The Barnet Group. Approval will depend on individual circumstances but must not be unreasonably refused. This written consent must be in addition to and separate from any disclosure made on the Declaration of Interest form.

Expression of Opinions

You must not divulge any information that is not already in the public domain.

If you are an employee and a resident or service user and wish to state an opinion about The Barnet Group through approved resident consultation routes, then you must make it clear that you are expressing your opinion as a resident or service user and not as an employee.

Likewise, where opinions are expressed on TV, film, websites, social networking sites, in photographs or any other public domain, you must not wear any badges or clothing which could identify you as an employee of The Barnet Group and when making the opinion as a resident you must make it clear that you are doing so as a resident.

Employees who are Trade Union officials must not make statements about The Barnet Group without making it clear that this is in their official union capacity in accordance with agreed working protocols.

Leadership responsibilities

Managers and leaders must model the behaviours expected under this Code and create the conditions that enable others to succeed.

If you are a manager, you are expected to:

- support staff development and competence;
- provide regular feedback and supervision;
- identify and address development needs through supervision, appraisal, observation, feedback, and service assurance;
- address poor performance fairly and promptly;
- promote a positive learning culture;
- encourage challenge and professional curiosity; and
- ensure customers' voices influence decisions.

Our integrity

Accountability and ownership

Employees are accountable for their actions, decisions, and professional conduct.

You have a duty to:

- take responsibility for the quality and timeliness of your work;
- acknowledge mistakes promptly;
- escalate concerns, risks, or service failures without delay;
- learn from feedback, incidents, and mistakes;

- create and maintain timely, accurate, objective, and complete records of material contacts, decisions, actions, risks, and commitments, in accordance with relevant policies and procedures; and
- act transparently when explaining decisions to residents and colleagues.

At The Barnet Group we view feedback, complaints, and resident insight as opportunities to improve services. This means:

- welcoming challenge and scrutiny;
- participating constructively in complaint investigations;
- identifying improvements arising from complaints and feedback;
- sharing learning with colleagues; and
- supporting a culture of continuous improvement.

Sustainability

The Barnet Group believes that we have a responsibility to develop a sustainable organisation to help look after our environment. It's important that we consider the impact of everything we do on the environment and you should discuss with your manager any ideas you have for improving working practices to reduce their environmental impact.

Am I doing the right thing?

Q: What can I do to help the environment?

A: You can be mindful of the impact on the environment as you undertake your day-to-day duties. Think about opportunities for recycling and cutting down on waste and travel. For instance:

- consider whether you really do need to print each document before you print it
- consider whether a conference call could be an alternative to travelling to a meeting
- if you do need to travel, aim to use public transport and if this isn't possible, try to car-share.

Protecting our assets

We each have a duty to look after and respect all of The Barnet Group's assets, this includes our place of work, any equipment we use such as computers, telephones and company vehicles as well as finances, information, supplies and even our working time. We should each protect The Barnet Group's assets from misuse, theft and waste.

You should:

- use company resources responsibly and appropriately
- ensure hardware, such as laptops and phones are never left in public or insecure places
- ensure that all sensitive, confidential and personal information you handle stays secure
- ensure that all expenditure is accurately, honestly and promptly accounted for.

Am I doing the right thing?

Q: Can I use my computer for personal use?

A: You may make limited reasonable personal use of your computer provided that doesn't interfere with your work or contravene any policies, laws or regulations

Use of the internet and email

Access to information systems and equipment is provided to assist you in your job performance and the delivery of your duties. Reasonable personal use of IT equipment and systems, including the Internet and email system, is permitted provided it is undertaken outside of work time or during lunch breaks and complies with TBG Acceptable Use Policy and TBG Secure Email Policy.

Social media use

You should exercise caution when posting or sharing content online, and take care not to disparage or embarrass the company, especially if your social media account links you to The Barnet Group.

You are personally responsible for the content you publish online, whether in a personal or professional capacity, and should always be careful to exercise good judgement and common sense.

You should be aware that content posted online anonymously, on private or personal accounts, or through seemingly-private direct messages, can still be traced back to The Barnet Group.

Which documents should I read?

Secure Email Policy Acceptable Use Policy Social Media Policy and Quick Guide

Confidential information and data protection

TBG is required to comply with all UK data protection-related legislation.

You must always:

- use personal information only for the purpose for which it was supplied
- ensure personal information is secure at all times and is relevant, accurate and kept up to date
- ensure that you follow any arrangements that are in place to comply with data protection legislation.

You must not:

- use any information obtained in the course of your employment for personal gain or benefit
- pass on any information to others unless required by your role

For example:

- when dealing with a housing application or request for a repair
- when raising an issue or complaint as a resident
- when using information gained on pricing during a tendering process

This list gives examples but is not exhaustive.

The Barnet Group information

It is generally accepted that open government is best. The law requires that certain types of information must be available to members, auditors, government departments, residents, service users and the public. The Barnet Group itself may decide to be open about other types of information. Employees must be aware of which information The Barnet Group is and is not open about. If in doubt guidance should be sought from management before information is disclosed.

The Barnet Group has arrangements for responding to statutory, regulatory, and other formal requests for information. These may include requests made under freedom of information, environmental information, data protection, and social housing transparency requirements,

depending on the organisation and information concerned. Employees must promptly refer requests to the Complaints and Information Team and must not deliberately conceal, alter, destroy, or withhold relevant information.

If you receive information from a Board Member or Councillor which is personal to that Board Member or councillor and does not belong to The Barnet Group you should not divulge the information without the prior written approval of that Board Member or councillor, except where such disclosure is required or sanctioned by the law.

Am I doing the right thing?

Q: I've seen a colleague copying data from the work database and I'm suspicious about its intended use. What should I do?

A: You should report this to your line manager immediately.

Which documents should I read?

Data Protection Policy

Freedom of Information and Environmental Information Requests Policy

Counter-Fraud, Bribery and Corruption Policy

Political neutrality

The Barnet Group work may take you into the political arena but you must ensure that you demonstrate the organisation's non-political nature and keep personal activities totally separate from The Barnet Group work.

You may participate in lawful political activity in a personal capacity. You must not present personal political views as those of The Barnet Group, use organisational resources for unauthorised political purposes, or act in a way that compromises the impartial performance of your role.

Intellectual property

Intellectual property is a generic term that includes inventions, creative writings and drawings. If these are created by the employee during the course of employment, then as a general rule they belong to TBG. However, various Acts of Parliament cover different types of intellectual property.

Inventions and patents

Inventions made before 1 June 1978 are the property of the employer if made in the course of that employer's employment. However, the Patents Act 1977 states that after the 1 June 1978 inventions are only the property of the employer if:

- they have been made in the course of the employee's normal duties; or
- they have been made in the course of duties specifically assigned to the employee and where invention might reasonably be expected; or
- It was made in the course of the employee's duties and at the time the employee had (because of the nature of his or her duties and particular responsibilities arising from them) a special obligation to further the interests of the employer.

Raising a concern

You should raise any concerns with your line manager or, if not appropriate, with a more senior manager or with HR. If you believe your concern is a whistleblowing issue, please refer to the Whistleblowing Policy. You may ask your trade union to raise a complaint on your

behalf. If possible, TBG will protect the identity of any individual who raises a concern and does not want their name disclosed. However, any investigation process will usually need to reveal the name of the person raising the concern and include a statement from them.

Anonymous concerns will be considered under the Whistleblowing Policy and Procedure.

Malicious allegations, i.e. deliberately raising false complaints with the intention of harming someone will be regarded as misconduct.

A final note

This Code of Conduct should be read in conjunction with all of the policies and procedures referred to in it as they contain important rules and information about how you are expected to carry out your work.

Remember to always ask an appropriate manager if you're unclear about anything in this Code, or other policies and procedures, or about what to do in a specific situation.

DRAFT