

# CODE OF CONDUCT

for Board Members, Staff and Involved Residents<sup>1</sup>

## 1. INTRODUCTION

The National Housing Federation’s Code of Governance 2020, adopted by ISHA’s Board, requires that the board and the organisation maintain high standards of probity and conduct.

Our four values and behaviours underpin all that we do:

- **Pride** in team ISHA: aim to get it right first time, learn from mistakes; share skills, knowledge, encourage and support others; celebrate success
- **Respect** for everyone: considerate and honest; work well with diversity; punctual, prepared, polite; ask questions, want to learn more
- **Trusted** to make the difference: take ownership and responsibility; do what we say we’ll do; take control of our own personal development
- **Passionate commitment to customers:** go the extra mile; willing to adapt in response to feedback; open to learn; listen to understand what customers need

While the conduct of all board members, staff and involved residents is expected to reflect these values and behaviours, this code more specifically defines the conduct required of all individuals directly involved in delivering our service and business activities. It emphasises engaging with each other in a professional manner, with dignity and respect, showing integrity and avoiding any suggestion of influence by biased or improper motives.

This code has been adapted from the NHF model code “Conduct becoming” and its Code of Conduct 2012. You must familiarise yourself with the contents of ISHA’s code and act in accordance with its principles and provisions at all times.

If board members or involved residents have any questions regarding the application of the code, or in relation to a specific issue, they should seek advice and guidance from the Company Secretary. If you believe there has been a breach of the code, you should report it to the Vice-Chair/Senior Independent Director or the Company Secretary.

<sup>1</sup> Board Members here shall also refer to co-opted Board Committee Members. For ISHA, ‘involved residents’ is defined as per the Resident Involvement and Engagement Strategy 2021-2025. This code does not apply to residents participating in resident forums and focus groups as their participation is ad hoc and they are not directly involved in decision-making.

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Members of staff should seek advice and guidance, where appropriate, from their line manager, the Human Resources Department or the Company Secretary. If you believe there has been a breach of the code, you should report it to Human Resources.

Any breach of the code will be investigated and may lead to disciplinary action. For board members and involved residents, the Procedure for Managing Breaches of the Code of Conduct by Board Members and Involved Residents will be followed. For staff, the process will follow ISHA's Disciplinary Procedure.

## 2. ASSOCIATED POLICIES

ISHA's Probity Framework includes this code and associated policies which support the principles of the code. See appendix A for the full list of associated policies which should be read in conjunction with this code.

## 3. PRINCIPLES OF THE CODE

### A. GENERAL RESPONSIBILITIES

#### Main Principle

You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of ISHA, its residents and other service users.

#### Provisions

A1. You must comply with the law, your terms of appointment and ISHA policies and procedures relating to your role.

A2. You must not conduct yourself in a manner which could reasonably be regarded as bringing ISHA into disrepute. This includes membership of, or participation in, activities organised by groups or organisations whose values are inconsistent with ISHA's (for instance, racist organisations) which could create reasonable doubt in your ability to comply with ISHA's values and this code.

A3. You must not bring ISHA'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 includes making derogatory comments about ISHA, its residents or other service users, partners or services, either in person or in writing or via any web-based media such as a personal blog or other site. This also applies if you do not name ISHA but where its identity can reasonably be inferred, or where you use a pseudonym but your identity can reasonably be inferred.

A4. You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.

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A5. You must respect the appropriate channels for handling tenancy and service provision issues. You must not act outside ISHA's established procedures in any matter concerning any resident or other service user.

A6. You must not misuse your position, for example, by using information acquired in the course of your duties for your private interests or those of others.

A7. 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.

A8. You must not engage in any political or campaigning activity that might conflict with the position of ISHA. Board members, Board committee members or involved residents intending to stand for political office must discuss the matter with the chair, and members of staff with their line manager.

### ***Board Members***

A9. If you take up new employment or appointments during your term of office on the board or on a board committee, you must make any necessary declaration of interest. Any such work or position must not interfere with your role as a board or committee member.

### ***Staff members***

A10. You must consult your manager before taking on any outside work or any position, paid or unpaid. Any such work or position must not interfere with your existing job or conflict with the interests of your job or ISHA.

## **B. CONFLICTS OF INTEREST**

### **Main Principle**

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

### **Provisions**

B1. You must comply with ISHA's policies and procedures for declaring, recording and handling conflicts of interest. Amongst other things, these require you to declare any private interests which may, or may be perceived to, conflict with the duties of your role.

B2. You must ensure that your entry in ISHA's register of interests is complete, accurate and up-to-date.

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B3. You must comply with ISHA's policies and procedures relating to the application for employment or housing from members of staff, board members, involved residents or others to whom they are related or closely connected.<sup>2</sup>

B4. You must not be involved in the appointment of staff where you are related, or are closely connected, to an applicant. You must declare any such relationship to the appropriate person. You must not be involved in decisions relating to discipline, promotion, pay or benefits for any member of staff to whom you are related or closely connected.

B5. You must not be involved in the appointment of a contractor or supplier where you are related, or closely connected, to an organisation or individual applying or tendering for a contract. You must declare any such relationship to the appropriate person. You must not be involved in establishing the terms of a contract, or its ongoing monitoring and management, where you are related, or closely connected, to the contractor or supplier.

B6. Except where specifically permitted, you must normally avoid using ISHA's 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 ISHA. 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 ISHA.

B7. You must not use, or attempt to use, your position to promote your personal interests or those of any connected person, business or other organisation.

## C. BRIBERY, GIFTS AND HOSPITALITY

### Main Principle

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.

### Provisions

C1. You must comply with the law and ISHA's policies and procedures in relation to:

- 1) Fraud, bribery and corruption, money laundering and
- 2) The giving, receipt, approval and recording of gifts and hospitality.

C2. You must not canvass or seek gifts or hospitality or other benefits.

C3. If you are offered gifts or hospitality, they should either be declined, or handled in accordance with ISHA's Gifts, Benefits and Hospitality Policy. The only exceptions are gifts of token value or modest hospitality given in connection with normal work meetings (diaries,

<sup>2</sup> See Appendix B for definitions of related and closely connected

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calendars, etc). All gifts should be declared and recorded in the online Hospitality Register held by the Company Secretary.

## **D. FUNDS AND RESOURCES**

### **Main Principle**

You must not misuse ISHA's funds or resources.

### **Provisions**

D1. You must comply with ISHA's policies and procedures regarding the use of its funds and resources. 'Resources' includes staff, information, telephone, computer and other IT facilities, equipment, stationery and transport.

D2. You must ensure that the organisational funds and resources entrusted to you are used efficiently, economically and effectively.

D3. You must comply with ISHA's policies and procedures regarding procurement ensuring value for money and fairness in decision-making.

D4. You must take reasonable measures to protect ISHA's funds, resources, property and assets from theft, damage and misuse.

D5. You must comply with ISHA'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.

D6. You must claim reimbursement only for expenditure that was properly and reasonably incurred in carrying out ISHA's business. You must ensure that any expenses claim you make is accurate and complies with ISHA's policies and procedures.

D7. You must comply with the provisions of s.122 of the Housing & Regeneration Act 2008 which restricts the making of gifts and payment of dividends and bonuses to members (shareholders) of the association which, in the case of ISHA, includes its board and co-opted committee members.[note: will need to change after updating shareholder policy]

## **E. CONFIDENTIALITY**

### **Main principle**

All board members, staff and involved residents have a responsibility to protect the confidentiality of personal data and any ISHA information that is commercially sensitive. Such data must only be divulged in the course of proper performance of your duties and must always be done proportionately and fairly. You must handle information in accordance with the law and ISHA's policies and procedures.

### **Provisions**

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E1. You must comply with the provisions of the Data Protection Act 2018 which governs the protection of personal data. All personal data held about residents and other service users, employees and others, whether on paper or electronically is subject to the provisions of the Act. ISHA's policies and procedures give further guidance.

E2. You must not disclose without authority any confidential business information. Confidential business information includes financial information and information relating to our customers, business plans, policies, staff and/or internal discussions. This duty continues to apply after you have left ISHA or relinquished your position.

E3. You must not, without permission from nominated staff member for press enquiries, pass or distribute to the press or media or any other external recipient(s) information or materials relating to ISHA.

E4. In your capacity as a board or staff member or involved resident, you must not, without prior authority:

- 1) Appear to represent the views or position of ISHA
- 2) Write letters to the press or other recipients(s)
- 3) Write media articles, blog posts or tweets etc, about ISHA and its activities, or
- 4) Make comments or statements to the media – if approached you must pass the enquiry to the appropriate person.

E5. You must not prevent another person from gaining access to information to which they are entitled by law.

## **F. RESPECT FOR OTHERS**

### **Main Principle**

Our success and reputation depend on the people who work here. Our reputation can only be maintained if we all behave professionally and with courtesy and respect towards each other, to our residents and clients and other people we come into contact with. Behaviour is a shared responsibility and we should all lead by example.

Respecting others' beliefs, cultures and lifestyles involves maintaining a non-judgemental approach to colleagues and residents. This includes accepting that others may have different religious, political or cultural beliefs or sexual orientation. It is essential that everyone creates an environment which is supportive and respectful and does not discriminate on the grounds of race, gender, marital status, religion, disability, age, sexual orientation, gender identity, pregnancy and maternity or any other protected characteristics.

### **Provisions**

F1. You must comply with the law and with ISHA's policies and procedures relating to equality and diversity. Equality laws not only prohibit discrimination but also impose positive duties to eliminate unlawful discrimination and promote equality. ISHA's policies give further guidance.

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F2. You must not harass, bully or attempt to intimidate any person or encourage others to do so. ISHA's policies give further guidance.

F3. You must not display materials in the workplace which other people might reasonably find offensive or use language which board or work colleagues or customers might reasonably find offensive.

## **G.RELATIONSHIPS BETWEEN BOARD MEMBERS, STAFF AND INVOLVED RESIDENTS**

### **Main Principle**

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

### **Provisions**

#### ***Board members***

G1. You have a duty of loyalty and support towards ISHA and this must be reflected in a constructive, professional relationship with its staff.

G2. You must not go beyond your role as a board member and become inappropriately involved in operational matters.

G3. In your dealings with staff, formally and informally, you must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies and objectives of ISHA.

#### ***Board members and involved residents***

G4. Where it is necessary to raise issues of poor staff performance at a formal meeting, these must be raised in a constructive way, aimed at getting things right in future, and not at criticising individuals. Any concerns about the performance of individuals must be discussed in confidence with the chair of the board, committee or panel or with the Chief Executive.

G5. You must not appear to undermine the authority of a senior officer in his or her dealings with a more junior member of staff.

G6. You must avoid inappropriate personal familiarity with members of staff.

G7. You must not ask or encourage a member of staff to act in any way which would conflict with compliance with this code or ISHA's policies and procedures.

#### ***Involved residents***

G8. You must not seek to instruct or direct a member of staff or contractor. The relevant manager or member of staff must convey all instructions.

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**Staff members**

G9. If your work brings you into contact with the board, a committee or a residents'/service users' committee or panel, you must:

- 1) Take direction from the board, or in accordance with any delegated authority of a committee or panel
- 2) Respond constructively to questioning or challenge, and
- 3) Respond willingly to requests for information.

G10. You must avoid inappropriate personal familiarity with board members and involved residents.

G11. You must not use informal channels to lobby or influence board members or involved residents on matters of ISHA's business.

G12. You must not knowingly mislead any of the board or any of ISHA's committees or panels. In presenting information, you must set out the facts and relevant issues truthfully.

**H. RELATIONSHIPS WITH RESIDENTS AND OTHER SERVICE USERS****Main Principle**

Maintaining high standards of professionalism, fairness and courtesy in all dealings with residents and complying with safeguarding policies and procedures ensures residents and staff are protected, promotes consistency and objectivity in the way we support residents and minimises the risk of concerns and complaints.

You must maintain high standards of professionalism, fairness and courtesy in all your dealings with residents and other service users and comply with ISHA's safeguarding policies and procedures.

**Provisions**

H1. You must treat all residents and other service users with courtesy and respect.

H2. You must not allow any personal relationship with a resident or other service user to conflict with your role and responsibilities.

H3. You must not give gifts or loans of money to, or receive loans or gifts of money from, residents or other service users.

H4. You must take great care in handling residents' and other service users' money, ensuring that a receipt is completed for every transaction.

H5. You must not invite or influence a resident or other service user to make a will or trust under which you are named as executor, trustee or beneficiary.

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H6. When handling information relating to residents and other service users, you must comply with the law and ISHA's policies and procedures relating to the protection of personal data.

H7. You must comply with ISHA's policies and procedures relating to the safeguarding of adults at risk and children.

## **I. HEALTH, SAFETY AND SECURITY**

### **Main Principle**

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

### **Provisions**

I1. You must comply with ISHA'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 ISHA's policy and procedures relating to lone working.

I2. You must comply with the law and ISHA's policies on smoking and on the use of alcohol, illegal drugs and other substances.

I3. You must comply with any ISHA policies relating to the security of premises.

I4. If responsible for maintaining relationships with maintenance suppliers and contractors, you must ensure they are made aware of and work in compliance with any ISHA Supplier Code of Conduct.

## **J. CONDUCT AT MEETINGS**

### **Main Principle**

Your conduct at meetings must show respect for all and comply with ISHA's standards.

### **Provisions**

J1. You must respect the position of the meeting chair, including sending apologies to the chair, or an appropriate officer, if you cannot attend or will be arriving late.

J2. You must be courteous to all other attendees by listening to all points of view and avoiding interruptions when another person is talking.

J3. You must not use threatening or aggressive behaviour or language, or act in a disruptive way.

J4. You must not attend meetings while intoxicated or under the influence of drugs.

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J5. Once a board, committee or panel meeting has properly reached a decision, you must share responsibility for that decision, even where you had not supported it.

### ***Board Members***

Further information on conduct, including how disputes and grievances can be raised and resolved, may be found in the Procedure for Board Member Disputes and Grievances in the Board Members Handbook.

## **K. REPRESENTING ISHA**

### **Main principle**

In representing ISHA at external events and in dealings with outside bodies, you are an ambassador for ISHA and must uphold and promote its values, objectives and policies.

### **Provisions**

K1. You must not become involved in, or be seen to endorse, any activity that may bring ISHA into disrepute. This includes but is not limited to illegal, immoral, racist or other discriminatory activity.

K2. In engaging in activities which promote the work of ISHA to the outside world, you must demonstrate commitment to ISHA and support for its values, policies and goals.

K3. In representing ISHA at formal or informal events, you must be appropriately dressed for the occasion. You are responsible for appropriate behaviour for any guest(s) of yours.

## **L. CRIMINAL PROCEEDINGS AND CONVICTIONS**

### **Main Principle**

In the case of criminal proceedings or conviction involving a board member, staff or involved resident, ISHA reserve the right to consider the impact of such proceedings on us and the compatibility of the proceedings or offence with the individual's role, and to take appropriate action. In certain circumstances disciplinary action may follow.

### ***Staff Members***

If your position carried a regular DBS check, for the protection of all parties, notify your Director in the event that you are charged with, cautioned for or convicted of a criminal offence. Your Director should seek advice from Human Resources. You may also decide to inform your Director if your role is not covered by a DBS check. The information will be treated with sensitivity and confidentiality. No action will be taken unless there is a direct impact on your position.

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## M. REPORTING CONCERNS

### Main Principle

You must report to the appropriate senior person within ISHA any reasonable and honest suspicions you may have about possible wrong doing.

### Provisions

M1. If you are aware of potentially dishonest or fraudulent activity, or material breaches of this code – by board members, staff or others – you must report it to the appropriate senior person within ISHA. ISHA's policies and procedures relating to fraud and confidential reporting (whistle-blowing) give further guidance.

M2. If you believe that you are being required to act in a way which conflicts with this code, you must report it to the appropriate senior person within ISHA.

M3. You must not victimise nor encourage or cause others to victimise any person who has used, intends to use, or is suspected of having used ISHA's confidential reporting procedures to report the misconduct, or alleged misconduct, of others.

### *Board Members*

If you have a concern about the board or the organisation that cannot be resolved through ISHA's policies and procedures, ISHA's adopted Code of Governance states that these concerns should be shared with the Board and formally recorded.

Appendix A- Probity Framework

Appendix B – Guidance on Declarations of Interest

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# ISHA's Probity Framework

## Areas Covered & Supporting Documents

Conduct	Conflicts of Interest	Bribery & Corruption	Personal Benefit*	Remuneration	Procurement	Reporting Concerns
Code of Conduct	Code of Conduct	Code of Conduct	Code of Conduct	Recognition & Reward Policy	Code of Conduct	Code of Conduct
<ul style="list-style-type: none"> <li>• Data Protection Policy</li> <li>• Equality, Diversity &amp; Inclusion Policy</li> <li>• Harassment at Work and Bullying at Work Policy</li> <li>• Health &amp; Safety Policy</li> <li>• IT Usage Policy</li> <li>• Safeguarding Policies</li> <li>• Social Media Policy</li> <li>• Appointment letters</li> <li>• Staff, Board Members Handbooks</li> </ul>	Declarations of Interest form & Registers for board members, staff and involved residents  Guidance on Declaring Interests	Fraud Policy & Register  Anti-Money Laundering Policy  Financial Regulations  Gifts, Benefits & Hospitality Policy & Register	Appointment & Promotion Policy  Allocation & Letting Policy (needs update)  Shared Ownership Allocation Policy  Gifts, Benefits & Hospitality Policy  *covers preferential treatment of board members, staff and involved residents and those closely connected with them for housing, employment;	Appointment & Promotion Policy  Equality, Diversity & Inclusion Policy  Staff Handbook  Financial Regulations  Financial Statements  Compensation Policy (residents)  Non-contractual Payments (staff): Remuneration Committee Terms of Reference	Bribery & Corruption policies  Supplier Code of Conduct (to be developed)	Confidential Reporting (Whistleblowing) Policy & Procedure

## Guidance Note on Declaring Interests

The National Housing Federation's Code of Governance 2020, adopted by ISHA's Board, requires that the board and the organisation maintain high standards of probity and conduct.

ISHA's Code of Conduct requires all board members, staff and involved residents to act at all times in good faith and in the best interests of ISHA, its residents and other service users and not on behalf of any interest group, for any personal interest or benefit or for the interest or benefit of friends, relatives or business colleagues.

To help us understand any personal interests that may present a conflict either for your role or the work of the association, and to avoid any suggestion of influence by biased or improper motives, all board members, staff and involved residents are required to complete a form declaring any interests for themselves and those closely connected to them (see Addendum for definition of "closely connected").

Forms are completed upon joining the organisation and annually thereafter, circulated by the Company Secretary (in the case of board/committee members and involved residents) and Human Resources for staff. The forms are reviewed for any potential or actual conflicts and recorded in a register of interests. The Company Secretary or Human Resources may contact you to clarify any of your declarations or discuss further.

If, during the course of the year, a change occurs in either your own interests or those of a person closely connected to you, you must amend your declaration of interest accordingly. **It is your responsibility to ensure that your declaration of interest is kept up to date at all times.** Failure to do so (and this includes failing to complete the annual declaration) is a breach of the Code of Conduct and may lead to disciplinary action.

### What is an 'interest'?

Guidance from the NHF Code of Conduct 2012 list the following areas where potential interests may arise:

- (1) employment or self-employment;
- (2) company directorships or business partnerships;
- (3) owner or controller of more than 2% of a publicly quoted company or more than 10% of any other company
- (4) significant ownership of land and/or property in the area of operation of the association;
- (5) tenancy or leasehold interest of a property owned by the association;
- (6) membership of a campaigning, residents' or community association which has interest in the business or area of operation of the association
- (7) positions of public responsibility such as an official or elected member of any statutory body
- (8) membership of another association or un-registered 'not for profit' body with interests in the area of operation of the association;
- (9) membership of secret societies and similar organisations.

It is important to declare both ***potential*** and ***actual*** conflicts of interest. A potential interest is one where the circumstances could *potentially* bring about some personal or business gain for the member/staff, their close relative or a person connected to them. An actual conflict of interest is where the circumstances *actually* do bring about some personal or business gain for the member/staff, their close relative or a person connected to them.

In the interest of transparency, memberships of political parties and pressure groups should always be declared.

Board members who are the paid staff or board members of, or who provide goods and services to, other housing or not for profit organisations should declare their interests in those organisations.

It is not possible to list all potential areas where a conflict of interest may arise. If you are unsure as to whether or not you have an interest to declare, seek advice from the Company Secretary or Human Resources. If in doubt, it is always better to declare.

### **Board Members**

In addition to a general declaration of interests, board and committee members must also declare any interests related to agenda items at meetings. Declaration of Interests is on the agenda at the beginning of every meeting. If a member has an interest in a particular agenda item, they should declare it at the beginning of the meeting and then leave the room for the discussion of that agenda item according to the association's Rule D18. They will also not be allowed to vote on the matter in question. Online, the member should log off from the meeting temporarily so they cannot hear the debate and influence the decision. The conflict of interest and leaving the room will be recorded in the minutes.

If it is not clear whether a member's interest requires them to not participate in a discussion and decision, the Chair will follow Rules D19 to D21.

### **Residents**

Board and committee members who are ISHA residents shall be deemed not to have an interest in any decision affecting all or a substantial group of residents of the association (rule D26). For example, if the Board is discussing or taking decisions on general policies that affect all residents, such as the rent policy, members who are residents would not need to declare an interest in this item. If, however, the board is discussing their particular estate or building, they must declare an interest in this matter. Meetings with involved residents should follow the same protocol.

### **Resolving conflicts of interest**

For board and committee members and involved residents, the Company Secretary will report any valid declared conflicts of interest to the Chair, Vice-Chair/Senior Independent Director and Chief Executive. Conflicts of interest for board and committee members will then be managed according to the association's rules D17-

D27. In the case of a fundamental or ongoing material conflict, the board will determine whether the person concerned shall cease to be a board member. If the member concerned does not voluntarily resign, they may be removed from the board in accordance with rule D9.

Where a staff member has a conflict of interest, the Head of People & Organisational Development will oversee the resolution of the conflict or potential conflict and work with the staff member's manager to ensure internal controls are in place if required. For example, a staff member who is also an ISHA resident should not be able to alter their own rent account or view the rent accounts or ASB records of their neighbours. Any conflicts for Leadership Team members will be reported to the Chief Executive and Chair so that they may manage them accordingly.

### **Dealing with unreported conflicts of interest**

Where there is evidence that someone has withheld information or provided misleading information about their interests or those of a person closely connected to them - whether deliberately or through taking insufficient care in making a declaration – this will be considered a breach of ISHA's Code of Conduct. As stated in the Code, breaches will be investigated and may lead to disciplinary action.

Board and committee members who fail to disclose an interest may be requested to vacate their office permanently or for a period of time if requested to do so through a majority vote of the board under rule D23.

For staff, the process will follow ISHA's Disciplinary Procedure.

For involved residents, the Scrutiny Panel and ISHA representatives would ask the resident to disclose the full nature of the conflict of interest. A decision will be made by the panel and ISHA representatives to whether the resident should excuse themselves from a particular project.

The Company Secretary will be responsible for ensuring that this guidance reflects ISHA's rules, Code of Governance, Code of Conduct and organisational policies.

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## **Addendum to Guidance on Declaring Interests**

### **How do we define a family member or close connection?**

Guidance to the NHF Code of Conduct 2012 includes as family members those who might reasonably be regarded as similar to family members, even though there is no relationship by birth or law, These could include:

- a partner (someone to whom the individual is married, is a civil partner or someone with whom they live in a similar capacity);
- parent, parent-in-law;
- son or daughter, step-son or step-daughter, child of a partner;
- brother or sister, brother or sister of a partner;
- grandparent, grandchild;
- uncle or aunt, nephew or niece;
- the partners of any of these people;
- any dependents; and
- any person on whom the individual depends.

It would also include estranged, separated or divorced family members (and estranged, separated or divorced family members who might reasonably be regarded as similar to be family members).

Close connections would be people with whom you are in regular or irregular contact for over a period of time who are more than an acquaintance. It would be someone that a member of the public might reasonably think you would be prepared to favour or disadvantage when discussing a matter that affects them. It may be a friend, colleague, neighbour, business associate or someone known through general social contacts.

Someone is considered closely connected to a company, partnership or other organisation if they, a family member or close connection

- is employed by that organisation, either directly or as a sub-contractor or an agent
- is a director, owner, board member, trustee, or has some other controlling or financial interest in the organisation
- holds shares in the organisation, or has some other financial stake or interest in its success; or
- if there is some other close connection or link that a reasonable person could take to create a conflict of interest.