

*Creating affordable  
homes and empowering  
communities*



# Code of Conduct for Board Members, Staff and Involved Residents

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**making a splash**  
in the areas we serve

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# Code of conduct

While the conduct is expected to reflect Boston Mayflower's values, this code goes further by setting out agreed, effective, specific conduct required of all individuals directly involved in delivering Boston Mayflower'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 – this includes members of Board, Committees, Customer Scrutiny Panel and Your Voice Members.

## Introduction

A copy of the Code will be made available to all staff, Board 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 Boston Mayflower. 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 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 A).. Although housing associations such as Boston Mayflower are not public bodies, the provision of social housing is a public function and Boston Mayflower recognises the need to uphold the same values of selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

## Associated policies and procedures

The code of conduct should be read in conjunction with Boston Mayflower's policies and procedures which are relevant to your role, including:

- The staff handbook;
- The health and safety policy;
- Standing orders;
- Financial regulations;
- Procurement policy;
- The HR policies;
- The equality and diversity policy;
- The IT policies;
- The whistle-blowing policy;
- The anti-fraud, bribery and corruption policy.

## Breach of code

If you believe there has been a breach of the code you should report the breach to the appropriate manager. Alternatively, you can report a breach under the Boston Mayflower whistle-blowing policy to any of the Executive or to Board Members.

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 appropriate. Anyone who has concerns about misconduct, and reports this in good faith, will have nothing to fear and will be supported by Boston Mayflower.

## The main principles of the code

### A. General responsibilities:

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

### B. Conflicts of interests:

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.

Your interests should be declared through the Declarations of Interest register on the Company Intranet.

### C. Bribery, gifts and hospitality:

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.

All hospitality, given and received along with gifts should be declared through the Hospitality Register on the Company Intranet

### D. Funds and resources:

You must not misuse Boston Mayflower's funds or resources.

### E. Confidentiality:

You must handle information in accordance with the law and Boston Mayflower's policies and procedures.

### F. Respect for others:

You must treat others with respect at all times

### G. Relationship between board members, staff and involved residents:

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

### G. Relationship with residents and other service users:

You must maintain high standards of professionalism, fairness and courtesy in all your dealings with residents and other service users.

### H. Health, safety and security:

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

### I. Conduct at meetings:

Your conduct at board and other meetings must meet a high standard of integrity, commitment and courtesy.

### J. Representing Boston Mayflower:

In representing Boston Mayflower at external events and in dealings with outside bodies, you must uphold and promote the association's values, objectives and policies.

## K. Learning and development:

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

## L. Reporting concerns:

You must report any reasonable and honest suspicions you may have about possible wrongdoing. The Company's Whistleblowing Policy provides guidance regarding the raising of concerns appropriately.

# 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 Boston Mayflower, its residents and other service users.

These duties and obligations are defined within the Roles and Responsibilities statement pertinent to your role.

## Provisions

**A1.** You must comply with the law, your terms of appointment and Boston Mayflower's policies and procedures relating to your role.

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

**A3.** You must not bring Boston Mayflower'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 Boston Mayflower, 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 Boston Mayflower but where its identity can reasonably be inferred, or where you use a pseudonym but your identity can reasonably be inferred.

If you have a genuine concern about possible wrongdoing, you must report it to the appropriate senior person within the organisation (see section M).

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

A5. You must respect the appropriate channels for handling tenancy and service provision issues. You must not act outside Boston Mayflower'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 compromise the position of Boston Mayflower. Board 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, you must make any necessary declaration of interest. Any such work or position must not interfere with your role as a board 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 Boston Mayflower.

## 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 Boston Mayflower'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 Boston Mayflower's register of interests is complete, accurate and up-to-date.

**B3.** You must comply with Boston Mayflower'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.

**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. **The association's policies and procedures are designed to ensure, and to demonstrate, that no preferential consideration is given to any such application.**

**B6.** Except where specifically permitted, you must normally avoid using Boston Mayflower's contractors and suppliers for private purposes. Where this is unavoidable, you must not receive a favourable service as a result of your connection with Boston Mayflower. 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 by you and the contractor as a result of the relationship with Boston Mayflower

**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 Boston Mayflower's policies and procedures in relation to:

- Bribery and corruption; and
- 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 prior approval sought for their acceptance. The only exceptions are gifts of token value or modest hospitality given in connection with normal work meetings. Boston Mayflower's policies give further guidance.

## D Funds and resources

### Main principle

You must not misuse Boston Mayflower's funds or resources.

### Provisions

D1. You must comply with Boston Mayflower'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 Boston Mayflower's policies and procedures regarding procurement ensuring value for money and fairness in decision-making.

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

D5. You must comply with Boston Mayflower'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 Boston Mayflower's business. You must ensure that any expenses claim you make is accurate and complies with Boston Mayflower's policies and procedures.

## E Confidentiality

## Main principle

You must handle information in accordance with the law and Boston Mayflower's policies and procedures.

## Provisions

**E1.** You must comply with the provisions of the Data Protection Act 1998 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. Boston Mayflower's policies and procedures give further guidance.

**E2.** You must not disclose without authority any confidential business information. This duty continues to apply after you have left Boston Mayflower or relinquished your position. Reference to this obligation can be found:

- For staff, in your employment contract and the Staff Handbook;
- For board members, in your contract for services; and
- For involved residents, in your signed confidentiality declaration.

**E3.** You must not, without permission, pass or distribute to the press or media or any other external recipient(s) information or materials relating to Boston Mayflower.

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

- Appear to represent the views or position of Boston Mayflower;
- Write letters to the press or other recipients;
- Write media articles, blog posts or tweets etc. about Boston Mayflower and its activities; or
- 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

You must treat others with respect at all times.

## Provisions

**F1.** You must comply with the law and with Boston Mayflower's policies and procedures relating to equality and diversity. 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. Boston Mayflower's policies give further guidance.

F2. You must not harass, bully or attempt to intimidate any person. Boston Mayflower's Equality and Diversity and Equal Opportunities 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 members, work colleagues or customers might reasonably find offensive.

## G Relationship 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 Boston Mayflower 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. Those members holding specific portfolios will have greater operational knowledge in this area but would not be expected to be operationally involved.

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 Boston Mayflower

#### 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 Boston Mayflower'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.

#### 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:

- Take direction from the board, or in accordance with any delegated authority of a committee or panel;
- Respond constructively to questioning or challenge; and
- 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 Boston Mayflower's business.

G12. You must not knowingly mislead the board or any of Boston Mayflower'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

You must maintain high standards of professionalism, fairness and courtesy in all your dealings with residents and other service users.

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

## 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 Boston Mayflower's health and safety policies and procedures and bring to the attention of the appropriate person any risks to yourself or others. In particular:
- Where you are provided with protective clothing this must be worn; and
  - For your own safety, you must comply with Boston Mayflower's policy and procedures relating to lone working.
- I2. You must comply with the law and Boston Mayflower's policies on smoking and on the use of alcohol, illegal drugs and other substances.
- I3. You must comply with Boston Mayflower's 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 Boston Mayflower's code of conduct for contractors.

# J Conduct at meetings

## Main principle

Your conduct at meetings must show respect for all, and comply with Boston Mayflower'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.
- 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.

# K Representing Boston Mayflower

## Main principle

In representing Boston Mayflower's at external events and in dealings with outside bodies, you are an ambassador for Boston Mayflower's 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 Boston Mayflower's 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 Boston Mayflower's to the outside world, you must demonstrate commitment to and support for its values, policies and goals.
- K3. In representing Boston Mayflower at formal or informal events, you must be appropriately dressed for the occasion.

# L Learning and Development

## Main principle

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

## Provisions

- L1. You must play an active part in Boston Mayflower's supervision and performance appraisal processes and welcome constructive feedback.
- L2. At the appropriate induction, appraisal or supervision meeting, you must make clear your personal training and development needs, so that they can be taken into account in Boston Mayflower's forward budgeting and planning.
- L3. Unless there are exceptional reasons, you must attend all learning and development events that have been arranged, either for you alone or as part of a group.

## Board members

- L4 Board Members will be appraised at least every two years where you should highlight your individual development needs
- L5. You must take responsibility for keeping your knowledge up to date in those areas in which you are a specialist.

# M Reporting Concerns

## Main principle

You must report to the appropriate senior person within Boston Mayflower any reasonable and honest suspicions you may have about possible wrongdoing.

## 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 Boston Mayflower. Boston Mayflower'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 Boston Mayflower.

M3. You must not victimise any person who has used, intends to use, or is suspected of having used Boston Mayflower's confidential reporting procedures to report the misconduct, or alleged misconduct, of others

## N Use of Premises or Office Facilities

### Main Principle

You may not use Boston Mayflower premises for the business purposes of any paid outside work.

### Provisions

- N1. This includes:
- Outside paid employment
  - Service as local councillors, magistrates, school governors
  - Jury Service paid by the company
  - Volunteering
  - Use of facilities
  - Political campaigning

These tasks should be undertaken during personal time or with approved annual leave.

N2. Board Members, staff and involved residents will not be allowed to cash personal cheques or give IOU's to the Company and goods and services for personal use cannot be ordered through the company.

## O Personal property

### Main principle

The Company is not responsible for personal property

### Provisions

O1. The Company does not take responsibility for personal property use, left or stored on company premises regardless of whether it is used for official business.

# P Personal Details

## Main principle

Maintenance of accurate personal records

## Provisions

**P1.** Board Members, staff and involved residents are required to complete an update of personal information annually.

**P2.** Any changes between review periods should be provided as soon as possible through HR Self Service which holds this information confidentially.

## Appendix 1

### 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 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 individuals 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.

## Appendix 2

Section 122 of the Housing and Regeneration Act 2008 122 Payments to members etc.

1. This section restricts the making of gifts, and the payment of dividends and bonuses, by a non-profit registered provider to:
  - A member or former member of the registered provider;
  - A member of the family of a member or former member of the registered provider; and
  - A company which has, as a director, a person within paragraph (a) or (b).
2. A gift may be made, and a dividend or bonus may be paid, only if it falls within one of the following permitted classes.
3. Class 1 are payments which:
  - Are in accordance with the constitution of the registered provider; and
  - Are due as interest on capital lent to the provider or subscribed in its shares.
4. Class 2 are payments which:
  - Are paid by a fully mutual housing association (within the meaning of section 1(2) of the Housing Associations Act 1985 (c.69); and
  - are due under:
    - i. Tenancy agreements with the association; or
    - ii. Agreements under which the former members became members
5. Class 3 are payments which:
  - Are in accordance with the constitution of the registered provider making the payment ('the payer'); and
  - Are made to a registered provider which is a subsidiary or associate of the payer.
6. If a registered company contravenes this section:
  - It may recover the wrongful gift or payment as a debt from the recipient; and
  - The regulator may require it to take action to recover the gift or payment.



## Equality Impact Assessment Initial Screening

### Code of Conduct for Board Members, Staff and Involved Residents

#### Name of policy

**Code of Conduct for Board Members, Staff and Involved Residents**

#### Provide a brief summary of the aims and main activities of the initiative: (bullet points)

Boston Mayflower's Code of Conduct has been designed considering our Board's decision to adopt the National Housing Federation's "Excellence in Standards of Conduct" in order to provide Board Members, Staff and Involved Residents with general guidelines and a procedural framework for personal conduct.

**Completed by:**

**Bridget Lloyd, Director of Corporate Services**

**Date: October 2015**

#### **STAGE 1: SCREENING**

This stage establishes whether a proposed initiative will have an impact from an equality perspective on any particular group of people or community – i.e. on the grounds of race, religion/faith/belief, gender (including transgender), sexual orientation, age, disability, or whether it is "equality neutral" (i.e. have no effect either positive or negative).

**Q 1. Who will benefit from this initiative?** Is there likely to be a positive impact on specific groups/communities (whether or not they are the intended beneficiaries), and if so, how? Or is it clear at this stage that it will be equality 'neutral' i.e. will have no particular effect on any group? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

It is intended that this policy will apply equally to every member of the Board, Staff and all Involved Residents and provide them with a supportive framework in which to deliver excellence in governance.

It is intended that this policy will be equality neutral.



## Equality Impact Assessment Initial Screening

### Code of Conduct for Board Members, Staff and Involved Residents

**Q 2. Is there likely to be an adverse impact on one or more minority/under-represented or community group as a result of this initiative?** If so, who may be affected and why: Or is it clear at this stage that it will be equality 'neutral'? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

We do not envisage any negative impact within any of our service delivery areas through the implementation of this policy.

We believe that this policy is equality neutral.

**Q 3. Is there sufficient data on the target beneficiary groups/communities?** Are any of these groups under or over represented? Do they have access to the same resources? What are your sources of data and are there any gaps? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

Yes

**Q 4. Outsourced services – if the initiative is partly or wholly provided by external organisations / agencies, please list any arrangements you plan to ensure that they promote equality and diversity.** *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

This is an internal policy and the Company is responsible for its implementation

**Q 5. Is the impact of the initiative (whether positive or negative) significant enough to warrant a full impact assessment – see guidance?** If not, will there be monitoring and review to assess the level of impact over a period of time? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

We do not perceive any negative impact that would warrant a full Equality Impact Assessment.

Should any negative impacts be highlighted through implementation then both our Policy and EIA will be reviewed.



## Equality Impact Assessment Initial Screening

### Code of Conduct for Board Members, Staff and Involved Residents

**Q 6. To be completed at six monthly review** Detail actions taken to assess the level of impact over a period of time, or to address any gaps in data.  
*Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

Annually reviewed – October t 2016