

Code of Conduct Policy

If you need any information in a different format, for example large print, Braille, audio file or another language, please email Communications@housing21.org.uk

Version number	5
Issue date	March 2026
Review date	December 2028
Board approval required?	No
If yes, date approved by Board	
Author's name and job title	Anna Cisek, People Services Advisor
Policy owner and job title	Carina Monnelly-Owen, Head of People Services
Policy Steering Group approval date	March 2026

Summary

At Housing 21, we are committed to fostering a culture of professionalism, integrity, and accountability. This Code of Conduct Policy brings together Housing 21's previous Code of Conduct, Uniform and Dress Code, Substance Misuse, Smoking at Work and Professional Boundaries policies into one overarching framework, to ensure all employees understand their responsibilities, adhere to organisational standards, and contribute to the delivery of high-quality services we provide to residents, colleagues and partners. This policy establishes clear expectations, operational guidance, and accessible support, promoting consistency, fairness, and accountability throughout the organisation. Any breaches of this Code, or other instances where an employee does not conduct themselves in an appropriate way, may be treated as misconduct or gross misconduct under the **Disciplinary Policy and Procedure** and could result in dismissal.

Respect, Inclusion & Wellbeing

Housing 21 strives to create an inclusive, respectful, and supportive workplace where every employee can thrive. Our employees are expected to act with dignity, fairness, and empathy in all interactions with colleagues, residents, and stakeholders. We value diversity, actively challenge discrimination and bias, and promote equality at every level. Employee wellbeing is central to our ethos, and support mechanisms—including mentoring, training, and the

Employee Assistance Programme—are in place to ensure employees feel valued, empowered, and able to meet their professional responsibilities safely and effectively.

Contents

1. [Aims, Objectives and Approach](#)
2. [Scope](#)
3. [Principles](#)
4. [Definitions](#)
5. [Roles and Responsibilities](#)
6. [Operationalising the Code of Conduct](#)
7. [Further Help and Advice](#)
8. [Monitoring and Review](#)
9. [How-to Procedures](#)

1. Aims, Objectives and Approach

At Housing 21, how we behave and treat each other matters. The aim of this Code of Conduct is to provide a clear, transparent framework that guides employee behaviour and professional standards across Housing 21. It ensures that employees act in the best interests of residents, colleagues, and the organisation at all times.

The policy sets out expectations for ethical decision-making, professional conduct, respect for diversity, and compliance with legal and organisational requirements. Our approach emphasises personal accountability, transparency, and continuous development, supporting employees to uphold the highest standards of service delivery and integrity.

Housing 21 is committed to embedding these principles into everyday practice, ensuring a positive, safe, and inclusive environment that reflects our values and enhances the quality of care and housing services.

2. Scope

This policy applies to all employees of Housing 21, regardless of role, contract type, or location.

It also informs the conduct of volunteers, contractors, and other individuals representing Housing 21, as appropriate.

The Code complements other organisational policies, including:

- [Respect & Inclusion Policy](#)
- [Safeguarding Adults Policy](#)
- [Data Protection Policy](#)
- [Health and Safety Policy](#)
- [Learning & Development Strategy](#)
- [Recruitment Policy](#) (which covers Relatives/Conflict of interest)
- [Control of Scheme Keys and use of the Key Safe Policy and Procedure](#)
- [Cash Handling Policy](#)
- [Anti Fraud Bribery and Corruption Policy](#)
- [Social Media Policy](#)
- [IT Acceptable Usage Policy](#)

- [Whistleblowing Policy](#)

This Code does not form part of an employee's contract of employment but should be read alongside all relevant organisational policies and procedures.

3. Principles

This section sets out the core principles of conduct at Housing 21 and what they mean for employees in practice.

3.1 Integrity and Ethical Behaviour

Employees must act with honesty, integrity, and fairness, and in a way that reflects Housing 21's values and our commitment to doing the right thing.

This means employees must:

- Make decisions that are lawful, ethical, and transparent.
- Not seek or accept any personal benefit, advantage, or favour because of their role (other than agreed terms and conditions of employment).
- Follow organisational policies and regulatory requirements at all times.

3.2 Respect, Dignity and Professional Behaviour

Every interaction with residents, colleagues, and stakeholders must demonstrate respect, dignity, and empathy.

This means employees must:

- Treat everyone fairly and courteously, even in challenging situations.
- Actively listen, seek to understand different perspectives, and communicate openly and respectfully.
- Avoid behaviour that is rude, intimidating, humiliating or undermining.
- Use inclusive and appropriate language in all written, digital and verbal communication.

3.3 Equality, Diversity and Inclusion

Employees must champion equality, diversity, and inclusion at all times.

This means employees must:

- Not harass, bully or discriminate against anyone for any reason, including any protected characteristic.
- Challenge and report discrimination, harassment or offensive behaviour when they see it.
- Consider the impact of their decisions on people from different backgrounds and with different needs, and support reasonable adjustments.

3.4 Confidentiality, Data Protection and Information Governance

Confidentiality and data protection are central to our operations.

This means employees must:

- Handle personal, sensitive and organisational information securely and only for legitimate business reasons.
- Share information only with authorised individuals and in line with the [Data Protection Policy](#).

- Not disclose confidential information to the media, friends, family, or others, including on social media unless legally permitted or required. For further information please refer to point 3.9 of this policy.
- Report any actual or suspected data breaches immediately, following the relevant procedures.

3.5 Conflicts of Interest and Relationships

Employees must identify, declare, and manage any actual or potential conflicts of interest that could compromise impartiality.

This means employees must:

- Declare any personal, financial, or family interests that could influence, or be perceived to influence, decisions made on behalf of Housing 21 (including interests in suppliers, contractors, or partner organisations).
- Follow the [Recruitment Policy](#) regarding relationships with applicants, Board members or employees, including the requirement to declare such relationships.
- Not be involved in recruitment, selection, or decision-making where a close relative or someone they are in a close personal relationship with is an applicant or beneficiary.
- Declare secondary employment, directorships or business interests that may overlap with Housing 21's activities and follow any conditions set.

3.6 Accountability, Performance and Attendance

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

This means employees must:

- Take responsibility for their work, learn from feedback, and meet agreed objectives.
- Maintain appropriate standards of attendance, punctuality, and reliability.
- Co-operate fully with investigations, audits, and internal reviews.

3.7 Fitness for Work, Substance Misuse and Wellbeing

Employees must maintain fitness for work to carry out their duties safely and effectively.

This means employees must:

- Attend work free from the influence of alcohol, illegal drugs, or misused medication that could impair judgement, safety or performance.
- Comply with the Substance Misuse How-to Procedure and seek support where needed.
- Use wellbeing support, including the [Employee Assistance Programme](#), and inform their manager if fitness to work may be affected.

3.8 Professional Boundaries and Relationships with Residents

Professional boundaries must be maintained at all times to protect residents, colleagues, and employees.

This means employees must:

- Maintain relationships with residents and service users that are professional and appropriate, never exploitative or overly familiar.
- Not enter into financial, business, or personal relationships with residents that could compromise professional judgement or create safeguarding concerns (including private work, loans, or gifts of significant value).
- Not accept personal legacies or bequests from residents or service users.
- Follow the Professional Boundaries How-to Procedure and safeguarding protocols.

Failure to declare or appropriately manage a personal relationship that creates a conflict of interest, or has the potential to compromise professionalism or safeguarding, will be treated as a serious matter. Engaging in or failing to declare personal relationships with residents or colleagues may constitute gross misconduct and could result in formal disciplinary action, up to and including dismissal.

3.9 Speaking Up, Whistleblowing and Safeguarding

Any concerns regarding unsafe, unethical, or unlawful behaviour must be raised promptly through appropriate channels.

This means employees must:

- Report concerns about fraud, corruption, malpractice, safeguarding, or serious risk to residents, colleagues, or the organisation using the [Whistleblowing Policy](#) and recognised routes.
- Co-operate with investigations and provide full and accurate information.
- Understand that Housing 21 will protect individuals who raise concerns in good faith from victimisation or retaliation.

3.10 Financial Integrity, Fraud, Cash Handling and Gifts

Employees must safeguard Housing 21's and residents' resources and must not obtain any improper financial advantage.

This means employees must:

- Follow the [Anti-Fraud and Bribery Policy](#), [Cash Handling / Handling Customers' Money Procedure](#) and related finance procedures.
- Not borrow from, lend to, or manage residents' money unless specifically authorised and in line with procedure.
- Not act as treasurer for resident clubs or use residents' money, bank cards or cheques for personal reasons.
- Only accept gifts, hospitality or other benefits of low value, where permitted by policy, and always declare them in line with the Gifts and Hospitality procedure; never accept anything that could improperly influence, or appear to influence, decisions.

3.11 Digital Responsibility and Social Media

Employees must use digital systems and social media responsibly and in a way that protects Housing 21's reputation.

This means employees must:

- Comply with the [IT Acceptable Usage Policy](#) and [Social Media Policy](#).
- Ensure any personal use of emails, phones or internet access is reasonable, does not interfere with work, and is not inappropriate or offensive.
- Not post content that could damage Housing 21's reputation or disclose confidential information, including while wearing or displaying Housing 21 uniform or ID.

4. Definitions

Confidential Information: Information about Housing 21, its residents, employees, operations, or business that is not publicly available and must only be shared with authorised individuals.

Conflict of Interest: A situation where an employee's personal interests, relationships or activities could influence or appear to influence their professional judgement or decisions made on behalf of Housing 21.

Professional Boundaries: The limits that define appropriate relationships between employees, residents, colleagues, and stakeholders to ensure ethical practice and safeguard wellbeing.

Harassment: Unwanted behaviour, verbal, non-verbal or physical, that creates an intimidating, hostile or offensive working environment. This includes (but is not limited to) sexual harassment, bullying, or discriminatory behaviour based on someone's race, gender, religion, age, disability, sexual orientation or any other protected characteristic.

Discrimination: Treating an individual or group unfairly because of their race, gender, age, disability, religion or belief, sexual orientation, nationality, gender reassignment or marriage or civil partnership.

Breach: Any act or omission that violates the Code of Conduct, organisational policies, legal requirements, or professional standards.

Stakeholders: People or groups with an interest in or affected by Housing 21's activities, including residents, employees, volunteers, contractors, regulators, and partners.

Ethical Behaviour: Acting with honesty, integrity and fairness, and in a way that reflects Housing 21's values and our commitment to doing the right thing.

Compliance: following the laws, regulations and internal policies that apply to Housing 21's work, ensuring that all actions and decisions meet required standards.

Whistleblowing: Raising concerns about unsafe, unethical, or unlawful behaviour through the proper channels without fear of reprisal.

Substance Misuse: Using illegal drugs or misusing prescribed medication or other substances (such as solvents), as well as the excessive or uncontrolled use of alcohol that affects performance, behaviour or safety at work.

Personal Protective Equipment (PPE): Equipment or clothing designed to protect employees from potential hazards or injury while at work

5. Roles and Responsibilities

Employee Responsibilities

- Familiarise yourself with and follow the policy
- Demonstrate integrity, accountability, and professionalism in all work-related activities.
- Treat colleagues, residents, and stakeholders with respect, empathy, and fairness.
- Maintain confidentiality and safeguard sensitive information.
- Declare any potential conflicts of interest and follow escalation procedures.
- Engage in continuous professional development, reflective practice, and learning opportunities.
- Raise any concerns or suggestions for improvement through the appropriate channel.

Line Manager Responsibilities

- Ensure all employees understand and adhere to this policy.
- Apply this policy fairly, consistently and without bias.
- Lead by example in demonstrating the principles of the Code of Conduct.
- Monitor compliance with the Code and provide timely guidance, feedback, and support.
- Investigate breaches or concerns appropriately, following How-to Procedures and safeguarding protocols.
- Seek guidance from People and Culture team when handling complex requests or concerns.
- Maintain accurate records of guidance, interventions, and outcomes in line with GDPR and organisational policies.

People & Culture Responsibilities

- Provide advice, tools, and training to managers and employees regarding the Code of Conduct.
- Maintain and update the Code and related How-to Procedures in line with legislation and best practice.
- Monitor adherence, analyse trends, and recommend organisational improvements.

6. Operationalising the Code of Conduct

This Code of Conduct supports Housing 21's compliance with relevant legislative and regulatory frameworks, including Care Quality Commission (CQC) standards where applicable.

Operationalising the Code of Conduct at Housing 21 means ensuring that the standards set out in this policy are consistently demonstrated across all aspects of work and service delivery. These expectations must guide day-to-day behaviour, professional judgement, and the quality of interactions with residents, colleagues, partners, and members of the public. The accompanying How-to Procedures provide further detail where specific operational steps are required; together, they form an integrated framework for safe, respectful and high-quality practice.

At Housing 21, employees operate within environments where dignity, independence and trust are central to the resident experience. Bringing the Code to life therefore requires employees to uphold the organisation's values—Respect, Integrity, Partnership and Excellence—and ensure these values are evident in every decision, conversation and action.

6.1 Embedding the Code in Everyday Work

Employees are expected to carry out their duties with professionalism, accountability and consistency. This includes:

- Acting in ways that support resident wellbeing, organisational integrity and service quality.
- Following Housing 21 policies, legal requirements and relevant How-to Procedures.
- Seeking guidance from a line manager, senior colleague or People & Culture where unsure.
- Co-operating with audits, inspections and investigations.
- Representing the organisation positively in all settings, including schemes, offices, community locations and remote or hybrid working.

- In all operational contexts—whether in residents’ homes, on courts, in offices or working digitally—conduct must reinforce trust and support safe and effective service delivery.

6.2 Ethical, Safe and Informed Decision-Making

Decision-making must be ethical, lawful and aligned with Housing 21’s values. When making decisions, employees must consider:

- The potential impact on resident safety, wellbeing and independence.
- Whether the decision aligns with organisational policies and best practice.
- Any potential or actual conflicts of interest, including relationships with residents, suppliers, applicants or colleagues.
- Whether they should consult a line manager, senior colleague or People & Culture.
- Whether the decision requires documentation in line with audit and reporting standards.
- Particular care must be taken in lone-working situations, safeguarding matters or circumstances involving risk, vulnerability or complexity.

6.3 Professional Communication and Behaviour

Employees must communicate in a manner that supports dignity, clarity and respect. This includes:

- Engaging with residents, families, colleagues and external stakeholders courteously and professionally.
- Addressing and reporting any behaviour that is inappropriate, discriminatory or unsafe.
- Ensuring written and digital communication is accurate, timely and aligned with professional standards.
- Maintaining clear and compliant records where required, in accordance with relevant How-to Procedures.
- Not making statements to the media or posting online on behalf of Housing 21 unless authorised by Communications.
- Communication must support a positive workplace culture and contribute to safe, effective resident services.

6.4 Equality, Diversity and Inclusion in Practice

Housing 21 is committed to creating inclusive environments where all individuals are treated fairly. Operationalising this commitment requires employees to:

- Recognise and respond appropriately to the diverse needs of residents and colleagues.
- Support reasonable adjustments that enable equitable access and participation.
- Challenge discriminatory behaviours, attitudes or assumptions.
- Consider the impact of decisions on individuals from different backgrounds or with different needs.

These expectations apply across all locations, including courts, retirement living schemes, offices, digital environments and community settings.

6.5 Confidentiality, Data Protection and Information Requests

Information must be handled lawfully, securely and responsibly. Employees must:

- Protect personal, sensitive and organisational information at all times.

- Ensure that data is accessed, used, stored and shared only in accordance with GDPR and internal policies.
- Refer requests for information from third parties (including families, external agencies, and others) to the appropriate team (e.g. People Services, Legal & Governance) where required.
- Follow the Accessing Records and Data Protection procedures when residents or employees request access to their personal information.
- Report any suspected or actual data breaches immediately, following the relevant How-to Procedures.

Safeguarding confidentiality is essential to maintaining resident trust and protecting Housing 21's regulatory responsibilities and reputation.

6.6 Professional Boundaries, Residents' Homes and Residents' Money

Clear professional boundaries underpin safe and ethical practice. Employees must:

- Maintain relationships with residents that are professional, appropriate and free from personal conflict or dependency.
- Not undertake private work for residents or service users, or offer services with the intention or effect of taking residents away from Housing 21 services.
- Only enter a resident's home with their consent and for a legitimate work purpose in line with rotas and role expectations; exceptions apply only where authorised in line with the [Accessing a Resident's Home Policy](#) (e.g. emergencies).
- Never to let anyone who is not authorised to enter a resident's home (i.e. not an employee of H21 or an employee who has no legitimate reason to be in the resident's home)
- Never remove a resident's personal property for their own use.
- Not accept personal legacies or bequests from residents or service users and must report any such offers immediately.
- Not borrow from, lend to, or manage residents' money unless expressly authorised under the [Handling Customers' Money Procedure](#); where authorised, all transactions must be documented and receipted.

Any unauthorised access to a resident's home or misuse of residents' money or property may be treated as gross misconduct and could lead to dismissal.

6.7 Fitness for Work, Uniform, Private Work and Safe Working Practices

Employees must be fit to carry out their duties safely and effectively. This includes:

- Adhering to the Substance Misuse How-to Procedure, ensuring no impairment from alcohol, drugs or misused medication.
- Seeking support where health or wellbeing may impact safe working.
- Complying with the Uniform and Dress Code How-to Procedure, including wearing PPE where required and ensuring clothing and presentation reflect professionalism and safety requirements.
- Not wearing Housing 21 uniform when socialising, engaging in activities that could damage Housing 21's reputation, or carrying out private work.
- Following lone-working requirements and safe systems of work to protect personal safety and resident wellbeing.
- Ensuring any secondary employment or private work is declared in advance and approved in line with the relevant How-to Procedure; secondary employment must not conflict with Housing 21's interests or adversely affect performance or attendance.

- Employees must engage in safe working practices, including appropriate use of equipment, PPE and manual handling techniques.

6.8 Safeguarding and Protection from Harm

Safeguarding responsibilities apply to every role at Housing 21. Employees must:

- Remain vigilant to signs of abuse, neglect, exploitation or concern.
- Act immediately upon any safeguarding concern and report it using recognised procedures.
- Complete mandatory safeguarding training and refreshers.
- Apply safeguarding principles consistently to protect residents and colleagues from harm.

Failure to follow safeguarding procedures may result in disciplinary action and, where relevant, regulatory escalation.

6.9 Digital Conduct, IT Use and Social Media

Employees must ensure that their use of digital platforms upholds organisational standards. This includes:

- Complying with the [IT Acceptable Usage Policy](#) and [Social Media Policy](#).
- Ensuring any personal use of Housing 21 devices and systems is reasonable, does not interfere with work, and does not incur unnecessary cost or risk.
- Not accessing, downloading or sharing inappropriate, offensive or illegal material.
- Ensuring online behaviour does not compromise confidentiality, professionalism or Housing 21's reputation.
- Avoiding online interactions with residents that breach professional boundaries.
- Reporting inappropriate or concerning digital content or cyber security incidents in line with organisational procedures.

Digital conduct is subject to the same expectations as all other professional behaviour.

6.10 Continuous Professional Development

Maintaining high professional standards requires ongoing learning. Employees must:

- Complete mandatory training and required updates within expected timeframes.
- Engage in reflective practice, supervision and performance development conversations.
- Apply learning to improve service delivery, resident outcomes and personal effectiveness.
- Contribute to organisational learning by sharing insights, best practice and improvements with colleagues.
- Continuous development supports both individual growth and Housing 21's commitment to excellence. Operational tools, guidance notes, and checklists are available to support consistent application of the Code across the organisation.

7. Further Help and Advice

The Employee Assistance Programme (EAP) provides a wide range of tools, resources, and support for employees. This includes a free 24/7 counselling, legal, and information line. Access the EAP using **BeWell** as the access code.

Employees are encouraged to raise any concerns regarding conduct, wellbeing, or ethical matters. Concerns can be directed to a line manager or the Governance and Risk Manager via:

- **Confidential Reporting Hotline:** 0303 1231 744 (leave a message if unanswered)
- **Email:** myconcerns@housing21.org.uk
- **Post:** Governance and Risk Manager, Farouk Mohammed (marked 'Private and Confidential')

Health and wellbeing self-help tools and resources are available on the employee wellbeing pages of the intranet or through discussion with a manager.

Support is also available for employees who wish to quit smoking through the following free services:

England	NHS Smokefree	0800 022 4332	www.smokefree.nhs.uk
Wales	NHS Direct Wales	0845 46 47	www.nhsdirect.wales.nhs.uk
Guernsey	Quitline	01481 233 170	www.gsyquitline.com

8. Monitoring and Review

The implementation and effectiveness of this Code of Conduct will be monitored through routine reporting, internal audits, incident reviews, employee feedback, and training compliance checks to ensure standards are consistently upheld.

Any breaches, patterns of non-compliance, or repeated incidents will be investigated, documented, and addressed in line with organisational procedures, supporting accountability and a culture of integrity.

This policy will be reviewed at least every three years or sooner if required due to changes in legislation, business needs, or updates to best practice. Responsibility for review lies with the People & Culture Team, in collaboration with relevant stakeholders across Housing 21. Monitoring outcomes will inform continuous improvement, leading to updates in How-to Procedures, guidance documents, and training programmes to maintain high standards of conduct.

9. How-to Procedures

The following procedures accompany and support this policy:

- 9.1 How-to Procedure – Code of Conduct (General)
- 9.2 How-to Procedure – Professional Boundaries
- 9.3 How-to Procedure – Substance Misuse
- 9.4 How-to Procedure – Uniform and Dress Code
- 9.5 How-to Procedure – Smoking at Work
- 9.6 How-to Procedure – Conflicts of Interest and Relationships at Work
- 9.7 How-to Procedure – Secondary Employment and Private Work
- 9.8 How-to Procedure – Gifts, Hospitality and Legacies
- 9.9 How-to Procedure – Handling Customers' Money / Cash Handling
- 9.10 How-to Procedure – Accessing a Resident's Home
- 9.11 How-to Procedure – Use of Contractors and Suppliers for Private Work

9.12 How-to Procedure – Digital Conduct, IT and Social Media

9.13 How-to Procedure – Whistleblowing, Fraud and Financial Irregularity