

## People Policies

### Group Employee Code of Conduct

#### **Our Commitment**

Argyll Community Housing Association Group is committed to provide equal opportunities across all services and to avoid discrimination. This policy is intended to assist Argyll Community Housing Association (ACHA) and Argyll Homes for All (AHFA) to put this commitment into practice. Compliance with this policy should also ensure that employees do not commit unlawful acts of discrimination.

**This policy can be made available in other formats, for example in large print, audio-format or Braille: the document may also be available in other languages, in full or summary form, as appropriate.**

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#### Section 1 - Context

This Code of Conduct sets out the expectations the Group has of the way employees will conduct themselves and applies equally to all employees of Argyll Community Housing Association (ACHA) and Argyll Homes for All (AHFA).

The Group is confident that its employees will rarely, if at all, require a reminder of the standards of conduct which they are expected to maintain.

This policy does not change or over-ride contractual obligations placed upon its employees.

#### Section 2 – The law and good practice

The main legislative areas which cover the code of conduct include:-

- The Employment Rights Act 1996
- The Equality Act 2010
- The Housing (Scotland) Act 2010
- The Bribery Act 2010
- Scottish Social Services Council 'Code of Practice for Social Service Workers and Employers'
- The Health and Safety at Work Act 1974

#### Section 3 – Our policy objectives

The following principles underpin this Code of Conduct and should help employees decide whether their actions are compliant:-

Selflessness	You should take decisions solely on the basis of the values and objectives of the Group. You should not do so in order to gain financial or other material benefit for yourself, your family or friends,
Integrity	You should avoid having any financial or other obligations to outside individuals or organisations that might influence you in relation to the Group.
Objectivity	You should ensure that in the delivery of services, the selection of employees and awarding of contracts, you maintain impartiality and base decisions on merit alone.
Accountability	You must accept accountability for your decisions and actions and submit yourself to whatever scrutiny is appropriate, internally and / or by external bodies and stakeholders.

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Openness	You should be as open as possible about all the decisions and actions that you take. You should give reasons for your decisions and restrict information only when individual or commercial confidentiality clearly so demands.
Honesty	You must declare any private interest relating to your duties and take steps to resolve any conflicts arising in a way that is lawful and protects the reputation, values and mission of the Group.
Leadership	You must support and promote these principles and lead by example.

#### Section 4 – Implementing our policy objectives

##### 4.1 General behaviour

When at work, employees are expected to show courtesy, efficiency, reliability, respect, sobriety and punctuality at all times to colleagues, customers and partners and carry out all duties in accordance with the group's policies and procedures.

Employees should not do anything intentional which might bring the Group into disrepute or undermine its integrities. This includes conduct taking place outside of the immediate normal working environment, for example at Christmas parties or other social events.

In circumstances where employees are representatives of trade unions or professional associations these individuals will be exempt as long as they are expressing the views or following the policies of these organisations.

You must take care when displaying materials in the office, and ensure that these would not reasonably cause offence to your colleagues. If in doubt, consult your line manager before displaying any materials.

##### 4.2 Scottish Social Services Council Conduct Compliance

Employees are required to meet the following standards to comply with the Scottish Social Services Council 'Code of Practice for Social Service Workers and Employers':

- Protect the rights and promote the interests of service users and carers.
- Strive to establish and maintain the trust and confidence of service users and carers.
- Promote the independence of service users while protecting them as far as possible from danger or harm.

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- Respect the rights of service users while seeking to ensure that their behaviour does not harm themselves or other people.
- Uphold public trust and confidence in social services.
- Be accountable for the quality of their work and take responsibility for maintaining and improving their knowledge and skills.

#### **4.3 Health and Safety**

Employees are expected to act in a way which promotes a healthy and safe working environment for themselves, their colleagues and customers. They have a duty of care to work safely and familiarise themselves with the Group's Health and Safety at Work Policies and Procedures.

#### **4.4 Employee Identification**

Employees should wear or carry identity badges (or other forms of identification) at all times when at work.

#### **4.5 Dress Code**

Employees must dress in a clean and reasonable manner and adhere to the Group's prescribed dress code. Where company clothing is provided, employees are required to wear this.

Employees provided with Personal Protective Equipment as part of the Group's Health and Safety procedures must wear this at all times when engaged in work where there are safety risks e.g. hard hats, safety shoes/boots and protective clothing.

#### **4.6 Use of Group facilities**

Employees may have occasional use of Group facilities; for example, occasional private telephone calls. This use shall not affect the rights of trade union representatives in respect of reasonable access and use to undertake their duties.

Employees can use Group facilities for the benefit of community or voluntary groups they are personally involved with, provided this is approved by Senior Management, for example using an office photocopier to make copies of a leaflet for a local community event, holding a meeting of a local group in the Group's offices.

Employees may use the Group's internet/e-mail facilities provided that:

- These are used in non-work time i.e. work breaks, outwith their working hours
- these are not used to access inappropriate web sites or send or receive inappropriate e-mail
- this use does not compromise the security or integrity of the Group IT system

Employees should not use Group vehicles or other equipment for private use.

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#### **4.7 Discrimination**

Employees should not discriminate against any other persons. Disciplinary action may be taken against any employee who are found to have done so. Employees should also familiarise themselves with the Group's Equal Opportunities Policy.

#### **4.8 Bullying/harassment**

Bullying, intimidating or otherwise harassing colleagues is considered a serious disciplinary matter and will be dealt with in line with the Group's Disciplinary Policy and Procedures.

#### **4.9 Alcohol and drug misuse**

Employees found intoxicated either through the use of alcohol, drugs or illegal substances during working hours will be subject to the disciplinary policy.

The Group will assist employees who demonstrate alcohol or illegal drug addiction or dependency to obtain medical assistance.

It may also require employees to submit for drug and alcohol testing where it considers that there is a health, safety or employee welfare issue arising from suspected alcohol or drugs misuse.

#### **4.10 Smoking**

Employees must comply with legislation in force regarding this matter.

#### **4.11 Conflicts of Interest**

Being a member of staff is of course only one part of your life. Other aspects of your life – such as family, friends and neighbours, voluntary work, causes you support, possibly business or financial interests, possibly your own housing arrangements – may have the potential to cross over into your role as a staff member.

However, as we are an organisation that works for the community (and uses public funds), it is essential that there is no conflict – and that there can be no reasonable perception of conflict – between your duties as a member of staff and your personal (or personal business or financial) interests.

Where you have a personal, business or financial interest in any matter that is relevant to our activities or is considered (or is likely to be considered), or you know that someone to whom you are closely connected has such an interest, you are required to declare any actual or potential conflicts of interest to the HR & Corporate Services Department and these will be recorded in the Group's Register.

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You must keep your entry in the Register of Interests complete, accurate and up to date

Employees who are involved in:

- Housing allocations
- Appointment of contractors
- Engaging Employees

should declare an interest if he/she, a connected person or a friend would potentially benefit from these activities, if the employee is aware of this. In normal circumstances, once a declaration of interest is made (which should be as early as possible in the process), the employee should take no part in the process.

Note: The Group will not contract with any firm in which an employee has a managing or controlling interest. If you are aware of a potential for this to occur, you should declare this interest to your line manager as soon as you become aware of this.

Employees should also be aware that certain activities they undertake may result in the group being in breach of our Payment and Benefit Policy.

In summary the main areas covered are:

The following are examples of the kind of interest that you must declare. Please note that this list is not exhaustive, and there may be other interests that you should also declare.

- Tenancy of a property – by you or someone to whom you are closely connected, of which we are the landlord
- Occupancy or ownership of a property – by you or someone to whom you are closely connected, which is factored or receives property related services from us
- Receipt of support services from us
- Membership of a community - or other organisation that is active in our areas of operation
- Voluntary work – with another RSL or with an organisation that does, or is likely to do, business with us
- Membership - of the governing body of another registered social landlord
- Being an elected member – of any local authority where we are active

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- If you purchase goods or services from us
- If you purchase goods or services from one of our approved contractors or Framework Agreement partners
- Significant shareholding in a company that we do business with
- Membership of a political, campaigning or other body whose interests and/or activities may affect our work or activities.
- Ownership of land or property in our areas of operation excluding for the purpose of your own residential use (for example, there is no requirement for you to declare any house in which you currently live).
- Unresolved dispute relating to the provision of services in connection with a tenancy

**Letting of contracts** – the Group cannot let a contract to a business in which a connected person of an employee has a substantial or controlling interest unless there is no economic alternative.

**Employment of a connected person**– if a connected person is an applicant for employment with the Group, you should take no part in the recruitment process.

This is not exhaustive and you need to be aware of any situation where you or a connected person may benefit as a result of your employment with the Group. Employees should familiarise themselves with the Group's Payment and Benefit policy.

In addition, the Group is required to "take all reasonable steps" to ensure that it records all declarations of interest in terms of the Group Payment and Benefit Policy. These include:

- Business interests outwith the Group
- Group tenancies or residence with a Group tenant
- Close family relationships with current employees
- Relationships to current, past or potential contractors

"Where you have a personal, business or financial interest in any matter that is relevant to our activities or is considered (or is likely to be considered), or you know that someone to whom you are closely connected has such an interest, you are required to declare any actual or potential conflicts of interest to the HR & Corporate Services Department and these will be recorded in the Group's Register".



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You must keep your entry in the Register of Interests complete, accurate and up to date.

You should note that in some circumstances, declaration of an interest may not be sufficient, and that it may be necessary for the organisation to take additional measures to deal satisfactorily with the situation so as to protect the probity and reputations of both yourself and the organisation. That is, we have policy on Payment and Benefit to ensure, for example: that you have no involvement in future decision making related to your disclosed interests; that any use of the Group's contractors is appropriate; in extreme cases a governing body member may step down if their disclosed interest creates an on-going conflict of interest.

#### **4.12 Tendering & Purchasing**

The Group endeavours to process all tendering and purchasing activities in a transparent and impartial way. All orders and contracts must be awarded on merit and by fair competition.

It is therefore necessary to ensure that those responsible for the management and administration of the Group's business are seen to make a clear distinction between their own personal affairs and those of the Group. You must not disclose confidential information on any tender details.

#### **4.13 Use of Group contractors and suppliers**

The Group recognises that employees may need to use contractors to carry out works from time to time. This should be carried out at normal commercial rates.

Group employees involved in contractor selection, supervision, appointment and issuing works orders should advise or seek advice from their line manager on any use they may wish to make of Group contractors and ensure that the use of the contractor is recorded on the register held by HRCS. The line manager has the discretion to say whether or not the contractual relationship between the contractor and the employee can go ahead. Employees should keep a record of the work done along with copy estimates and invoices from a contractor.

Other employees need not notify the Group of this, but should ensure that they obtain proper estimates and invoices from a contractor.

#### **4.14 Employment Matters**

Employees involved in making appointments should ensure that these are based on merit alone. Personal preferences should not influence any judgements that you make whilst acting on behalf of the group.

The law and the Group's current recruitment and selection procedures must be thoroughly observed and decisions made must be transparent and impartial.

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All recruitment and selection procedures and decisions must also comply with the group's Equal Opportunities Policy.

The Group is conscious of the equality, management and fraud risks associated with the employment of connected persons but does not prohibit it so long as:

- There has been a rigorous, fair and competitive recruitment process
- Connected persons are not employed in the same section as their relative or one works in a different location to the other, and there is no line management responsibility
- There is a low risk of complicity between the two posts
- There is a low risk of management problems arising from the employment of the relative.

#### **4.15 Employment outside the Group**

Group employees should not undertake outside, casual or freelance work with a firm or individual with whom the Group may contract. Employees should not undertake any private work for the Group's tenants.

Group employees are able to take up certain employment outside the group, with permission from the Group's Senior Management Team, provided that this does not affect their ability to carry out their normal duties with the group.

The Group's Policy on Second Jobs details the requirements for seeking permission and the conditions attached to any permission which is granted.

Employees undertaking outside work while representing the Group e.g. lecturing, consultancy, training, agency services are encouraged to do this with Senior Management Team permission. This work will be considered to be carried out in Group time. Any fees paid for this work should be remitted to the group.

Employees are reminded that they are responsible for any tax liability on any outside paid work they undertake. Employees should also advise their line manager of any outside paid work they undertake to comply with the Working Time Directive.

#### **4.16 Relationships at work**

Employees should avoid letting close personal relationships interfere with their work. In the event that you do have, or form a close personal relationship with a colleague or other person closely associated with the Group, you should seek confidential guidance from your line manager or the Head of Department.

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Where feasible and it is appropriate or possible the Group will consider redeployment to employees who have close relationships in order that they do not have a line management or supervisory relationship with each other.

#### 4.17 Honesty and Integrity

Employees are expected to work with honesty and integrity at all times and consideration should be given to:-

- Will my actions endanger myself or other people?
- Can my actions be justified?
- Are my actions legal?
- Are my actions complying with Group policies and procedures?
- Would I be compromised if my actions were known?

You must not seek to use informal channels to influence the governing body regarding decisions to be made about the conduct of our business.

A situation may arise where you are invited to be present at a meeting where a matter in which you have a personal (or a personal business or financial) interest is discussed. In such cases you must inform the meeting chair at the start of the meeting, or as soon as you become aware that this is the case. You would then be required to leave the meeting for the duration of the particular item. If in any doubt, you should ask the meeting chair or another senior person present for guidance. This applies to all meetings that you attend as a member of our staff – both internal and external.

#### 4.18 Gifts and Hospitality

Employees offered gifts or hospitality should as a rule decline these, unless

- a) the gift is of a value up to £40 (please refer to the Group Payment and Benefit Policy).
- b) to refuse would cause offence and would reflect adversely on the Group – in this case, the gift should be handed over to the Group

For the avoidance of doubt, hospitality which forms a part of an event such as conference or training event is acceptable. Hospitality linked to working or business lunches is also acceptable.

In the event that you are offered hospitality and are unsure whether to accept, you should seek the guidance of your line manager or the ACHA's Governance & Compliance Manager.

If you feel that the purpose of offering a gift or hospitality is to commercially influence the Group, then this must be declined.

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For further information please refer to the Group Payment and Benefit Policy.

Gifts of cash must always be declined.

All offers of gifts and hospitality, whether accepted or declined must be recorded in the register which is kept for this purpose. This register will be available for public inspection.

#### **4.19 Bribery Act 2010**

The Group forbids all forms of bribery. Bribery includes a financial or other advantage intended to persuade someone to perform improperly a function or activity.

You are not allowed to accept bribes from or give bribes to anyone with whom the Group does business. Please refer to the Group Payment and Benefit Policy for more information.

You are also obliged to report any instances of suspected bribery within either the Group or any of its business partners. If you are not sure whether or not any activity you are involved in may constitute “bribery” you should always seek advice from your manager before undertaking such activity.

Accepting or giving bribes will result in disciplinary action including dismissal and can also result in criminal prosecution and imprisonment of up to 10 years for individuals found guilty of such acts.

All employees have a duty to immediately report any act of attempted, suspected or detected fraud, theft, bribery and corruption.

This can be done in a confidential manner to an appropriate person, for example: a senior officer, the Chair, a Board member, or the Audit Committee. Please refer to the Group Whistleblowing Policy for further advice.

#### **4.20 Confidentiality**

Employees are expected to respect the confidentiality of:

- Individual customers and tenants
- Colleagues
- The Group’s commercial business
- Documents which are so classified
- Any information covered by the Data Protection Act and the Group’s Code of Practice as outlined in the Openness and Confidentiality Policy

This list is not exhaustive. Employees should familiarise themselves with the Group’s Policy on Openness and Confidentiality and Code of Practice on Data Protection.

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#### 4.21 Dealing with Information

When handling information, there should be a balance between openness and confidentiality. It is a requirement that certain information is available to members, auditors and the Regulators. You should be aware of these requirements and act accordingly.

#### 4.22 Disclosure of Information

In the course of your involvement with the Group you may have access to confidential information about our business, customers, partners, board members / employees and of other information. Matters which may be confidential, business sensitive or a loss to the business should be advised to the Senior Management Team.

Examples of such confidential information include:-

- Information relating to specific individuals , including customers, employees and Governing Body members
- Details of contracts for the supply of goods or services
- Financial statements and business projections
- Information concerning the terms of negotiations relating to the acquisition or disposal of property
- Marketing plans or strategies
- New business developments or plans
- Business acquisition plans
- Plans to employ new personnel
- Information concerning labour relations, consultations or negotiations with employees
- Information concerning legal proceedings
- Items specifically marked “confidential”
- Software and computer programmes

#### 4.23 Data / Equipment / Vehicle Security

Employees are responsible for ensuring the security and safekeeping of all Group data, including that held on laptop computers, ipaqs and other multi-media sources. In addition they are responsible for the security and safekeeping of any equipment or vehicles provided to them to allow them to perform their duties.

Any loss or damage of data, equipment or vehicles due to negligence may result in disciplinary action being taken under the Group’s Disciplinary Procedures.

#### 4.24 Social Networking

We respect your right to have a private life and that includes joining any social sites you wish. However, information posted on such sites is classed as public and not private.

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You must not disclose confidential information relating to the Group, its customers, partners, suppliers, Governing Body members, employees etc., on any social networking sites.

You must not post any derogatory comments regarding people and events connected to the Group or make any remarks which could potentially bring the Group into disrepute. Any such actions could result in disciplinary action, up to and including dismissal.

#### **4.25 Public Statements**

The Group has a Communication Policy which includes handling media enquiries. All employees must comply with this policy. You are not allowed to publish any material, deliver any lecture or address issues relating specifically to the Group or its business without prior approval of the Senior Management Team. This does not circumscribe your duties and responsibilities but aims to prevent you being considered a participant or biased in campaigns or politics which directly affect the Group.

#### **4.26 Political Campaigning and Public Activities**

It is crucial that officials and employees of the Group carry out their work without any bias towards any political or other group.

You must follow the expressed policies and procedures of the Group and must not allow your own personal or political opinions to interfere with your role within the Group.

None of the above impinges on your rights to be an active citizen or, for example, an active trade unionist or member of a political party acting in such capacity.

#### **4.27 Financial Conduct**

You must ensure that you:

- Use funds and resources for the purpose intended and in a responsible and lawful manner.
- Safeguard them from abuse, theft or waste.
- Strive for value for money.
- Apply and observe the Group's financial regulations and internal controls.

As a general rule, in relation to tenants and service users you must not;

- Give or loan them money;
- Receive a gift or loan of money from them;
- Invite or influence them to make a will or trust under which you are named as executor, trustee or beneficiary.

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Employees are expected to report any breaches of this code to Senior Management. In exceptional circumstances where there is a real danger of reprisal, anonymity can be granted to those reporting fraud, theft and any other illegal activities etc.

In circumstances where you have a declared family connection to a tenant/service user, common sense will be applied and the organisation would not seek to impose restrictions on the private exchange of money between you and that individual.

#### **4.28 Theft / fraud / financial & organisational loss**

Although we strive to meet the highest ethical standards, we recognise that, like any other business the Group risks financial and organisational loss due to fraud. It may damage the service we provide and our reputation with customers, partners, public and the Group's regulatory bodies.

The Group has a responsibility to protect its assets, reputation and the public funds it receives and is fully committed to the prevention, detection and reporting of fraud, theft and corruption and recovery of assets.

All employees have a duty to immediately report any act of attempted, suspected or detected fraud, theft, loss and corruption to the Director of Finance and IT or, in their absence, any other Senior Management Team member.

The Group will, as soon as practically possible, conduct a full internal investigation in to any such activity as well as taking any other course of action deemed suitable in the circumstances, including reporting the matter to the Police and / or other relevant bodies.

#### **4.29 Whistle-blowing**

Employees should familiarise themselves with the Group's Whistle-blowing policy. If you become aware of other employees undertaking activities which are in conflict with the Group policies and procedures or are illegal, you should report this to a member of the Group's Senior Management Team.

If the employee who is suspected of such activities is a member of the Management Team, this should be reported to the Chief Executive and in the event of the Chief Executive, to the Chair of the Board of Management.

#### **4.30 Criminal charges and convictions**

The Group has an obligation to safeguard the welfare of tenants, employees, and members of the public and as such needs to be aware of any criminal charges or convictions for staff, so that it can consider any potential impact on the employment.

As such, the Group requires all employees to report to them any criminal charges brought against them, for any reason, within one week of being charged.

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Depending on the nature of the charge and the nature of the employee's job, and where appropriate, the Group reserves the right to suspend any employee charged with a criminal offence, on full pay, or to ask the employee to accept redeployment to another role, until the case is heard in court.

In the event that the employee refuses redeployment to another role which is suitable for the employee to carry out, the employee may be suspended *without* pay pending any trial. The foregoing provisions are without prejudice to the Group's right to terminate the employment of any employee where the circumstances merit it.

The Group also requires all employees to report to them any criminal convictions against them, for any reason, within one week of being convicted of any criminal offence. Depending on the nature of any criminal conviction in relation to the employees' job, the Group reserves the right to terminate their employment, our Disciplinary Procedure gives full details of the process we will follow but this will only apply where it is not reasonable to continue the employment.

Failure to disclose details of any criminal charge or conviction, as above, will be a disciplinary offence and could lead to the termination of employment.

Employees who are an essential user, regular business traveller or company vehicle driver must report any driving offence or endorsement on their driving licence within one week of its occurrence.

In the event that an employee loses their driving licence for any reason, or are unable to provide a fully insured vehicle for business travel, the Group reserves the right to terminate their employment in appropriate cases, our Disciplinary Procedure gives full details of the process we will follow.

#### **4.31 Breaches of this Code of Conduct**

In the event of a breach of this Code of Conduct, then depending on the seriousness of the breach, this may be dealt with by any of a range of measures from an informal reminder to the formal invoking of disciplinary procedures.

### **Section 5 Performance Management**

#### **5.1. Methods of performance management**

We have established a system of performance management that is based on two main methods:

- Firstly, we monitor our performance against targets which are set out by the Group Boards of Management.



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- Secondly, where practicable, we carry out statistical analysis of the process which is reported on by Human Resources on a regular basis.

This may include: -

- the number of breaches
- the action taken
- the impact on the Group

#### **5.2. Using performance management information**

In line with our legal duties under the Data Protection Act 1998, we gather performance information for specific purposes (see Section 10).

These purposes are to:

- ensure that you identify any form of discrimination that is unlawful and unfair; and
- take steps to amend or alter policies or practices to remove any discriminatory practices.

#### **Section 6 – Development and training**

We will provide training on the Group Code of Conduct to all employees of the Group.

You must participate in any necessary training, and play an active part in our performance appraisal process. You will contribute to the identification of any personal training needs you may have in order to keep your professional skills and knowledge up to date.

Staff must make themselves familiar with the terms of this Code and act in accordance with its requirements at all times. Staff are required to sign the Code (in the `Statement of Acceptance` at the end) to confirm that they have read and understood the terms of the Code and they have a personal responsibility to uphold the requirements of this Code.

#### **Section 7 – Our positive action initiatives**

In line with our equality policy, we develop initiatives that promote our equality commitments throughout organisational services and practices. In this connection, our major positive action initiative in respect of this policy is the development of a comprehensive and quality advice and guidance for employees.

You should be aware that under the Equality Act 2010, the following characteristics are specifically protected: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

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#### **Section 8 – Dealing with complaints**

Complaints relating to the Code of Conduct are dealt with in line with our disciplinary or grievance procedure. In terms of this Code complaints can be made if we fail to apply this policy properly or don't meet our organisational standards.

#### **Section 9 – Consultation and review procedures**

9.1 This Code will be monitored by us to judge its effectiveness and will be updated in accordance with changes in the law.

9.2 We will review our Code of Conduct in accordance with the results shown by our monitoring systems. If changes are required we will implement them.

#### **Section 10 – Confidentiality and data protection guidance**

Information provided by employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the General Data Protection Regulation (GDPR).

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#### Section 11 – Statement of Acceptance

I have read and understood the terms of this Code of Conduct and

- I agree to uphold its requirements in all my activities as a staff member of the Argyll Community Housing Association Group.
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- I confirm that I am aware that I must declare and manage any personal interests in accordance with our policy.
- I agree to review all relevant Registers regularly to ensure that all entries relating to me are accurate.
- I understand that, if I am found to have breached any points mentioned in this Code of Conduct or acted against its spirit, action will be taken in accordance with our disciplinary procedures and could ultimately result in my dismissal.

Signed: \_\_\_\_\_

Print Name \_\_\_\_\_

Dated: \_\_\_\_\_