



EMPLOYEE CODE OF CONDUCT



Introduction

1. Community Gateway Association's (CGA) Code of Conduct has been developed in recognition that everything we do will be, and should be, measured against the highest standards of ethical business conduct.
2. Our Code of Conduct is one of the ways we put the organisation's values and associated behaviours into practice: [Values & Behaviours Booklet.pdf](#)



WE PUT TENANTS AT THE HEART OF ALL WE DO

We know, value and respect our tenants, and work with them to make a difference.



WE DO THE RIGHT THING

We act with honesty and integrity, we ask questions and think differently, and do the things that matter.



WE OWN IT

We take responsibility for our own actions and we deliver on our promises.



WE AIM HIGH

We are creative and resourceful, constantly seeking improvements to achieve the highest possible standard.



WE ARE ONE TEAM

We value and support each other, build positive relationships, and work together to achieve more.

3. Employees must not conduct themselves in a manner which could reasonably be regarded as bringing CGA into disrepute. If an employee has a genuine concern about possible wrongdoing, it must be reported to their line manager, their Head of Service or the People Services Team. Employees may also report any serious wrongdoing in the form of a disclosure in accordance with the Speak Out process or the Whistleblowing Procedure.

ACTING IN THE BEST INTERESTS OF CGA AND ITS TENANTS

CGA Value: We put tenants at the heart of all we do.

Meeting your responsibilities

4. Employees must fulfil their duties and obligations responsibly, always acting in good faith, and in the best interests of CGA, other employees, tenants, customers and for the delivery of CGA's strategic objectives.
5. Expectations of employees:
 - To fulfil the requirements of their role to the best of their ability, and work towards CGA's strategic objectives.
 - To act respectfully towards others, and not in a way that discriminates against or unjustifiably favours particular groups, individuals or interests, including based on any protected characteristic that they may have.
 - To consider the impact of their actions on the safety and wellbeing of tenants.
 - To gain approval from their Head of Service before accepting any additional employment – paid or unpaid - outside of CGA. For managers and senior managers, director approval is needed. Any additional employment should also be included on the Annual Declaration form and declared promptly to the People Services Team. Roles such as volunteering roles, e.g. Scout Leader or School Governor do not need permission, unless there is potential for them to impact on the employee's work. If in doubt, employees should seek advice from the People Services Team.

Representing CGA

6. In representing CGA in any capacity, including at external events, in dealings with outside bodies and on social media, employees are ambassadors for CGA and must uphold and promote its values, objectives and policies.

7. Expectations of employees:

- To act in accordance with CGA's values, policies and procedures
- Not to conduct themselves in a manner which has the potential to bring CGA into disrepute.
- Not to make derogatory, false or otherwise damaging comments about CGA, or any individual, service or organisation connected to CGA.
- Not to appear to officially represent the views or position of CGA or disclose information relating to CGA to the press or other recipients without prior authority from the Executive Leadership Team.
- Not to make comments or statements to the media – any requests must be passed directly to the Engagement and Communications team.
- To adhere to CGA's policies in the use of email, intranet and internet including social media.
- When representing or linking to CGA through any medium including professional or personal social media accounts, such as Facebook or LinkedIn, to act with professionalism and make clear in what capacity they are communicating, for example, 'The views expressed here are my own and not necessarily those of my employer'.
- To discuss with their manager any intentions to stand for political office. There may be circumstances where holding political office may conflict with CGA's interests, as the organisation must remain politically neutral.
- Not to be members of or participate in activities organised by groups or organisations whose values are inconsistent with CGA's and which could create reasonable doubt in the employee's ability to uphold CGA's values.
- There may be social or celebratory occasions where the consumption of alcohol is allowed, for example an awards ceremony, but employees should use good judgment and never drink in a way that leads to impaired performance or inappropriate behaviour, endangers the safety of others, or violates the law (e.g. driving under the influence). Illegal drugs are strictly prohibited, as is attending work under the influence of alcohol.

BEHAVING WITH INTEGRITY

CGA Value: We do the right thing

Conflicts of interest

8. Employees must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between their duties to CGA and their personal interests, other duties and relationships. Each year all employees must complete an Annual Declaration Form which is retained on file by the Business Assurance Team.

9. Expectations of employees:
 - To formally declare, as early as possible, any interests that currently conflict, could conflict, or may be seen to conflict with their role—now or in the future.
 - To declare any known relationship to a person applying for or performing a role within CGA. Where a relationship exists, employees must not be involved in that person's recruitment, appointment, performance management or reward.
 - To declare any known relationship to a tenant, potential tenant, or other customer of the association, and not to be involved in decisions relating to their relationship with CGA or seek or accept preferential treatment for them.
 - To declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to CGA. Where a relationship exists, employees must not be involved in the appointment, performance management or reward of that contract / person.
 - Except where specifically permitted, avoid using CGA contractors and suppliers for private purposes.
 - Not to use or attempt to use their position to promote their personal interests or those of any person, business or other organisation connected to the employee for personal gain.

- If carrying out personal work outside of working hours, not to use any CGA equipment, tools, vehicles or devices. All CGA equipment is provided solely for the purposes of delivering services to our tenants.

Bribery, gifts and hospitality

10. Employees must not offer, seek or accept bribes or inducements to act improperly or corruptly. They must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise the employee's judgement or integrity or place them under an obligation to those individuals or organisations. Employees must not seek or accept preferential treatment for CGA's services, such as housing accommodation or employment.
11. Expectations of employees:
 - Not to request or seek gifts of hospitality or other benefits, especially if the value is significant, or the gift is from someone known to be in dispute with the organisation or bidding for work with CGA. Generally, acceptance of inexpensive 'token' non-cash gifts (less than £20) is allowed e.g. a bunch of flowers or a box of chocolates, particularly if refusing it would cause upset or offence.
 - Gifts with an estimated value of between £20 and £50 may be accepted, where it is deemed appropriate and within the spirit of the Probity Policy to do so, but not retained. Any such gift must be passed to the Governance Co-ordinator, who will record it in the Gifts and Hospitality Register.
 - If employees are unsure about accepting a gift or believe there may be an attempt to influence them, they should refer to the Gifts and Hospitality Procedure or speak to the Governance Co-ordinator.
 - All offers of gifts and hospitality (whether accepted or declined and no matter what value) must be immediately reported to the Governance Co-ordinator who will make a record in the Gifts and Hospitality Register.

- Reimbursement for any expenses incurred must be claimed in line with the Expenses Policy.

Confidentiality

12. Employees must only process information in accordance with the law and with CGA's Data Protection Policy.
13. Expectations of employees:
 - To not disclose, without the necessary permission and authority, any personal data about tenants, customers or employees.
 - To not disclose, without the necessary permission and authority, any confidential or sensitive information about CGA.
 - To not, without authority, pass or distribute to the press or media, or any other external recipients, any unpublished information relating to CGA, unless they are doing so in line with the Whistleblowing Policy and Procedure.
 - To comply with CGA's IT policies relating to the acceptable use of its computer and communications systems, which are provided for work purposes only.

Reporting Concerns

14. Employees must report any reasonable suspicion about any wrongdoing in line with the Whistleblowing Procedure.
15. Expectations of employees:
 - To report any concerns using the Whistleblowing Procedure. This includes any potential dishonest or fraudulent activity, any material breaches of the Code of Conduct or relevant legislation, including health and safety.
 - To report any concerns, if they believe that they are being asked to act in a way which conflicts with this Code of Conduct, or any legislation.
 - Not to victimise or disadvantage any person who uses or intends to use the Whistleblowing Procedure to report actual or alleged wrongdoing.

CONDUCTING YOURSELF PROFESSIONALLY AND TREATING OTHERS WELL

CGA Value: We are one team

Respect for Others

16. Equality, diversity and inclusion are a key focus in everything that the organisation does. CGA wants employees to be able to be themselves at work, whilst being respectful of our corporate values and adhering to our expected behaviours.
17. Expectations of employees:
 - To treat everyone, they meet with respect, care and consideration.
 - To show respect for people's chosen identities.
 - To promote, through their own behaviours, CGA's inclusive culture, accepting and accommodating people from all backgrounds, cultures, personal and protected characteristics.
 - Not to harass, bully or attempt to intimidate any individual, or use threatening, aggressive or discriminatory behaviour. Not to use microaggressions in speech or behaviour, examples of which can be found in the Anti-Bullying and Harassment Policy.
 - Not to display any materials in the workplace or use language which others may reasonably find offensive.
 - To report any unfair or unequal treatment, and where it is their role to do so, to investigate such reports thoroughly, with compassion and respecting confidentiality.

Working with tenants and other customers

18. Employees are expected to be professional, fair and courteous in all dealings with tenants and customers, displaying CGA's values at all times.
19. Expectations of employees:

- To seek and value the views of tenants and other customers when making decisions that will affect them. The Engagement and Communications Team can support consultation activities.
- To not allow any personal relationship with a tenant to influence how they carry out their role.
- To not give personal gifts or loans, or receive personal loans, or gifts of money from tenants.
- To not handle tenants' money, except where it is absolutely necessary, and to ensure that a receipt is completed for any transaction. Employees should act in accordance with relevant financial procedures to ensure appropriate handling of tenants' money.
- Not to invite or influence a tenant to make a will or trust under which the employee is named as an executor, trustee or beneficiary, unless they are a person to whom the employee is closely connected.

Professional relationships

20. Employees are expected to be maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.
21. Expectations of employees:
 - Not to ask or encourage the commitment of wrongdoing, including any breach of this Code of Conduct.
 - To behave in a professional manner, maintaining independence and integrity at all times. This includes avoiding inappropriate personal familiarity with board members and involved tenants in professional settings.
 - Not to use informal channels to lobby or influence Board members or involved tenants on CGA matters.
 - Not to knowingly mislead the Board or any other committees. In presenting information, to set out the facts, relevant issues and risks truthfully and objectively.

- To advise their Line Manager and update their Annual Declaration Form if a sexual or romantic relationship with a colleague develops.

Learning and development

22. Employees are expected to take responsibility for maintaining the skills, knowledge and professional competence required to perform their role effectively and to deliver safe, fair and high quality services to tenants and other customers.
23. Expectation of employees:
24. To engage in induction, mandatory training, 1-2-1s, annual check-ins and development activities relevant to their role
 - To offer open and constructive feedback and invite feedback about their own performance.
 - To assist in identifying their own training and development needs and raising these with their manager, seeking advice, support or escalation when they have concerns about their limitations
 - To keep up to date with changes to policies, procedures, guidance and regulatory requirements
 - To not undertake work, make decisions or provide assurance where they are not suitably trained, experienced or authorised to do so

PROTECTING YOURSELF, OTHER PEOPLE AND THE ENVIRONMENT

CGA Value: We own it

Health, safety and security

25. Employee's conduct and decision-making must promote the health, safety, security and wellbeing of themselves and others.
26. Expectations of employees:

- To not knowingly put their own or others' health, safety, security or wellbeing unnecessarily at risk.
- To report any concerns about the health, safety, security or wellbeing of themselves, another individual or group of individuals.
- To refrain from smoking in CGA vehicles, or any other areas with the exception of the designated smoking areas near CGA buildings.
- To ensure they secure their laptop, tools, important equipment, information and personal belongings, even while on CGA's premises.
- To always wear their ID badge visibly while working and not allow anyone without an ID badge into CGA premises without challenge. Anyone acting suspiciously on or around CGA premises should be reported immediately to either the Fleet and Facilities Team or the People Services Team.

Protecting the environment

27. Employees should strive to avoid or reduce any possible negative impacts of the environment.
28. Expectation of employees:
- To consider the environmental impact of all decisions, and to where possible, seek to achieve positive environmental outcomes

UPHOLDING THIS CODE OF CONDUCT

29. Any breaches of the Code of Conduct may lead to formal disciplinary action. Breaches which constitute gross misconduct could lead to dismissal from employment.
30. It is impossible to spell out every possible ethical scenario that employees might face. CGA relies on the judgement of employees to uphold a high standard of integrity for themselves and the organisation. Therefore, if employees are unsure, they should speak to their manager or the People

Services Team. No employee will be victimised for reporting any genuine concerns.

Data Protection

31. Any data retained in line with this Code will be done so in line with the retention schedule relevant to the data collected.

Monitoring and review

32. This Code will be monitored in line with its review date, any changes to best practice, or any significant amends to other related policies or procedures which will affect this Code. Tenants will be involved in the review of the Code.

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