



Intra Group Policy

Code of Conduct - Staff

Approval Date: August 2021
Review Date: August 2022
Version 1



This policy applies to;

Link Group Link Housing LinkLiving PSL

Link Property Horizon Larkfield West Highland

This policy is subject to Freedom Of Information publication scheme and is to be published on the following websites;

Link LinkLiving Horizon Larkfield

West Highland

The Code of Conduct sets out standards set out by Link and the relevant governing bodies, in particular the Scottish Federation of Housing Associations. A number of Link policies support the Code of Conduct. Where applicable, reference is made to those policies. The policy is non-contractual and may be amended from time to time.

Equality Impact Assessment

This Policy will be applied in accordance with Link Group's Policy on Equality, Diversity and Inclusion, as well as the Equality Act 2010. There are no potential implications for employees, workers or volunteers who have protected characteristics under the Equality Act. The application of this policy and associated policies will ensure that reasonable adjustments are made for people with protected characteristics.

Privacy Impact Assessment

When managing processes and responding to events which fall within the scope of the Code of Conduct, Link processes personal data collected in accordance with its data protection policy. Data collected from employees, workers and volunteers is held securely and accessed by, and disclosed to, individuals only for the purposes of managing matters related to the Code of Conduct. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with Link's data protection policy immediately.

Policy Owner

Director of Human
Resources and Business
Support

Review Manager

HR Business Partner

Approved By

Group Leadership Team

Revision History

Date	Version Number	Comments
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May 2021	1	Updated to comply with SFHA Model Code of Conduct for Staff April 2021
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1. INTRODUCTION

- 1.1 Link attaches the greatest importance to ensuring that high standards of behaviour are demonstrated by all of our people and in all of our activities.
- 1.2 This Code of Conduct sets out the standards of conduct required of you as an employee, worker or volunteer. You are required to observe these standards in all the activities that you undertake in connection with your employment with us.
- 1.3 As a Registered Social Landlord (RSL), we are required to adopt and comply with an appropriate Code of Conduct¹. This Code is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations (SFHA) and Employers in Voluntary Housing (EVH) – which the Scottish Housing Regulator (SHR) has confirmed fully complies with its Regulatory Standards.
- 1.4 You must make yourself familiar with the terms of this Code and act in accordance with its requirements at all times. You are required to sign the Code (in the 'Statement of the Acceptance' on p20) to confirm that you have read and understood the terms of the Code and you have a personal responsibility to uphold the requirements of this Code.
- 1.5 You must also ensure you are familiar with - and comply with - all of Link **Group** policies.
- 1.6 If there are any aspects of this Code, or of any of the related policies, on which you are unclear, you must seek guidance from your manager. Your manager, or Human Resources, will also be able to give guidance where you are unsure how the Code or related policies apply in a particular situation.

Who this Code applies to

- 1.7 This Code of Conduct applies to everyone who works for us whether employed directly or otherwise.
- 1.8 A copy of this Code will be given to every person that it applies to.

*There are references throughout this Code of Conduct (the Code) to 'I' and 'you' which means the employee, worker or volunteer of Link **Group Ltd and its subsidiaries** who has signed this Code. References to 'we', 'us' and 'our' mean Link **Group and its subsidiaries**. References to "Link" shall include: Link Group Limited; Link Housing Association Limited; LinkLiving Limited; Link Property Limited; Larkfield Housing Association Limited; West Highland Housing Association Limited; and Horizon Housing Association Limited.*

¹ Scottish Housing Regulator (2019), Regulatory Framework, [Regulatory Standard 5.2](#)

2. SCOTTISH SOCIAL HOUSING CHARTER (CHARTER), REGULATORY AND LEGAL CONTEXT

The following Charter outcomes, regulatory requirements or legislation relates to this policy:

- Scottish Federation of Housing Associations Model Code of Conduct for Staff
- Regulation by the Scottish Housing Regulator
- Regulation by the Care Inspectorate
- Regulation by the Scottish Social Services Council

The policy will achieve compliance, mitigate and monitor associated risk of non-compliance as follows:

- The policy requires to be read and accepted by all employees, workers and volunteers, confirmed through a signed Statement of Acceptance

3. PRINCIPLES

The following principles govern the operation of this policy:

How the Code is structured

1. The Code is based on the Nolan Principles on Standards in Public Life² which are recognised as defining good conduct for those who work for the public using public money.
2. The Scottish Federation of Housing Associations and EVH have defined three groups of principles as the basis for the Code:

A Honesty and Integrity

Gifts and hospitality
Prevention of bribery
Personal benefit
Resources, facilities and premises
Funds and expenses
Tenants/service users and money
General responsibilities

B Openness and Accountability

Declaring interests
Handling information
Respecting confidentiality

² Committee on Standards in Public Life 1995, [Nolan Principles on Standards in Public Life](#)

Using social media
Reporting concerns

C [Selflessness, Objectivity, Leadership](#)

Fulfilling your role
Working with tenants and other service users
Upholding our reputation
Showing respect for others

3. Each of the three sections begins with a statement of principle. This is followed by a number of provisions which set out the requirements of the Code in more detail.

The Code is not exhaustive and it should be remembered that all employees, workers and volunteers of RSLs are responsible for ensuring that their conduct at all times meets the high standards that the RSL sector is recognised for upholding. As well as observing the detail of the Code, you should apply its intention and spirit to all situations in employment.

You are required to sign the Statement of Acceptance at the conclusion of this code in Appendix 2 which also outlines the implications for any breach of the code.

4. OBJECTIVES

The objectives of this policy are to:

- Provide a framework for standards of conduct
- Reference to other related Link policies
- Provide information about what personal interests should be declared and how to do this

5. APPROACH AND METHOD

The Group Leadership Team in its formal approval of the policy acknowledges that it accepts full responsibility for its implementation. Day-to-day responsibility for the operation of this policy lies with the appropriate directors and managers of Link and its partner companies. All relevant employees, workers and volunteers have a responsibility to ensure that this policy is applied as instructed.

The policy will be implemented using the following approaches:

5.1 The Code of Conduct

A. Honesty and Integrity:
You must act at all times with honesty and integrity. You must not use, or seek to use, your position to gain financial or other benefit for yourself, your family or friends.

Gifts and hospitality

- A.1** I will act, and ensure I am seen to act, wholly in the interests of our organisation, our tenants, other residents in our communities and other service users. I will ensure that I do not benefit improperly from my position.
- A.2** I will not accept any offers of gifts or hospitality from individuals or organisations which might reasonably create – or be capable of creating – an impression of impropriety, influence or place me under an obligation to these individuals or organisations. I will comply with Link’s Entitlements, Payments and Benefits Policy on the matter.

Prevention of bribery

- A.3** We must comply with anti-bribery legislation. I will comply with Link’s anti-bribery and corruption policies.
- A.4** We forbid all forms of bribery - meaning a financial or other advantage or inducement intended to persuade someone to perform improperly any function or activity. I will not offer, seek or accept bribes or other inducements from any individual or organisation and I will comply fully with Link’s Anti-bribery, Fraud and Corruption Policy and Anti-money Laundering Policy. I am aware that offering, seeking or accepting bribes or other inducements will result in disciplinary action and may also result in criminal prosecution.
- A.5** I will report to my manager or Human Resources any instances of suspected bribery or corruption within the organisation or any external organisation with which we have dealings.

Personal benefit

- A.6** I recognise that neither I, nor someone closely connected to me, can as a result of my role with Link receive preferential treatment relating to any services provided by the organisation or its contractors/suppliers: I will ensure that I can demonstrate this.
- A.7** I will not use, or seek to use, my position to promote my personal interests or those of any person with whom I am closely connected, or the interests of any business or other organisation with which I have a connection. (Appendix 1 defines what is meant by 'closely connected').

Resources, facilities and premises

- A.8** I will only use our resources, facilities and premises for the purposes intended and in a responsible and lawful manner. This includes office premises, telephone, computer and other IT facilities, equipment, stationery, transport and staff.

A.9 I will comply with all of our relevant policies, including (but not exclusively) Electronic Information Security Policy, ICT&D Security and Terms of Use Policy, Records Management Policy, health & safety, Equality, Diversity and Inclusion Policy, and Dignity at Work Policy and human rights.

A.10 I will not undertake work for another organisation - or for any personal business – on Link’s premises nor use our resources or facilities for such a purpose, unless I have specific permission from my line manager. I will comply Link’s Additional Employment Policy (**West Highland Housing Association use EVH Terms and Conditions of Employment**).

Funds and expenses

A.11 I recognise that Link’s funds must be safeguarded from abuse, theft or waste. At all times, I will apply and observe all of our financial regulations and internal controls.

A.12 I will comply with our relevant policies, including the Procurement Strategy and Procurement Policy, when procuring goods/services and the Business Travel and Expenses and Professional Subscriptions and Memberships Policies when claiming expenses.

Tenants/service users and money

A.13 As a general rule, in relation to tenants and service users, I will 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 I am named as executor, trustee or beneficiary.

General responsibilities

A.14 I will not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.

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

A.15 In presenting information, I will take all reasonable steps to ensure that I set out the facts and relevant issues truthfully. If I work in a service registered with the Care Inspectorate and am registered with the Scottish Social Services Council (SSSC), I accept that I have particular responsibilities under the SSSC Code of Practice and I must comply with this.

A.16 I will avoid any situation that could give rise to suspicion or suggest improper conduct.

A.17 I will inform my manager or Human Resources if I am notified of any action by a professional body that is relevant to my role with Link and/or which could impact Link's reputation that I am or may be party to.

B. Openness and Accountability:

You must declare all relevant personal interests. You must handle information in accordance with our policies and procedures. You must report to the appropriate senior person within Link any reasonable and honest suspicions you may have about possible wrongdoing.

Declaring interests

- B.1** I recognise that Link must ensure that no conflict arises, or could reasonably be perceived to arise, between my duties and my personal interests, financial or otherwise. I will declare, and manage openly and appropriately, any actual or potential interests or conflicts. With respect of other employment I will comply with Link's Additional Employment Policy (**West Highland Housing Association use EVH Terms and Conditions of Employment**).
- B.2** Where I have a personal, business or financial interest in any matter that is relevant to Link's activities or is being considered (or is likely to be considered), or I know that someone to whom I am closely connected has such an interest, I will declare it promptly and record it in our Register of Interests.
- B.3** I will keep my entry in the Register of Interests complete, accurate and up to date.

Handling information

- B.4** I will observe and uphold the legal requirements and our policies in respect of the storage and handling of information, including personal and financial information. Our Data Protection Policy gives further guidance.
- B.5** I will respond to requests for information positively and will not prevent people or bodies from being provided with information that they are entitled to receive.
- B.6** I will not use confidential information acquired through my work as one of our employees, workers or volunteers for my private interests or any other purpose for which it is not intended.

Respecting confidentiality

- B.7** I will respect confidentiality and ensure that I do not disclose information to anyone who is not entitled to receive it, both whilst I am a member of staff and after I have left employment at Link.
- B.8** Unless specifically authorised to do so, I will not make comments or statements in public or to the media or on social media sites, or pass any documents or other information to the press or media about us or our activities. I will pass any such enquiries to Link's Communication Officer (**West Highland Housing Association's CEO**) quickly.

B.9 I will not publish any material or deliver any lecture or address any issues relating specifically to us or our activities without prior approval. This includes invitations to speak at conferences or external events.

Using social media

B.10 I will not disclose any private or confidential information relating to us, our customers, partners, suppliers, board members, or employees, workers or volunteers on any social networking sites, bulletin boards, blogs or similar. (See also **C12** under “**Upholding our reputation**”). This applies whether I am posting under my own name or a pseudonym.

Reporting concerns

B.11 If I become aware of any actual or potential fraud, corruption or wrongdoing, or breaches of this Code, I will report this to my manager or to Human Resources. I am aware that I may do so on a confidential basis. Our Whistleblowing Policy gives further information.

B.12 I will not victimise any person who has used - or intends to use/ is suspected of having used - our confidential reporting or whistleblowing procedures to report any actual or alleged fraud, corruption or wrongdoing by others. I know I can find further information in the Anti-bribery, Fraud and Corruption Policy, Anti-money Laundering Policy and Whistleblowing Policy.

4.4 C. Selflessness, Objectivity and Leadership:

You must act in the best interests of Link at all times within the framework set by the organisation, working to promote our aims and objectives, upholding our values and setting a good example by your own conduct.

Fulfilling your role

C.1 I will comply with the terms of my appointment and our policies and procedures relating to my role.

C.2 I will fulfil my duties responsibly, exercising reasonable skill and care and acting at all times in Link's best interests and that of our tenants and other service users.

I will always aim to put the needs of Link's tenants and service users first in my day to day work, within the framework of our policies and procedures.

C.3 I will uphold and promote Link's values, aims and objectives and in accordance with the relevant legal and regulatory requirements (including those, as applicable, of the Scottish Housing Regulator, the Office of the Scottish Charity Regulator, the Financial Conduct Authority, the Care Inspectorate and the Scottish Social Services Council).

If I am in doubt as to the legal and regulatory requirements that are relevant to my role, I will seek guidance from my manager.

C.4 I will work at all times in accordance with our policies and procedures and I will not allow my own personal or political opinions to affect the way in which I carry out my duties. This does not impinge on my right to be an active citizen or, for example, to be an active trade unionist.

C.5 I will take direction from my line manager, other senior managers and the governing body, and exercise responsibly any authority that comes with my role as a staff member.

C.6 I will not seek to use informal channels to influence the governing body regarding decisions to be made about the conduct of our business.

C.7 I will consult my manager before taking on any outside work or any position (paid or unpaid) that will in any way impact on my role with Link. I recognise that any such work or position must not interfere with my existing job or conflict with Link's interests. I will comply with the Additional Employment Policy (**EVH Terms and Conditions of Employment for West Highland Housing Association**). Appendix 1 gives more details on declaring interests.

C.8 I will participate in any necessary training and play a constructive part in our performance appraisal process. I will contribute to the identification of any personal training needs I may have in order to keep my professional skills and knowledge up to date.

Working with tenants and other service users

- C.9** I will maintain high standards of professionalism, fairness and courtesy in all my dealings with tenants and other service users.
- C.10** I will not allow any personal relationship with a tenant or other service user to conflict with the conduct of my role and responsibilities.
- C.11** I will use the appropriate channels for handling tenancy and service provision issues. I will not act outside our established procedures in any matter concerning any tenant or other service user.

Upholding our reputation

- C.12** I will not act in a way that could reasonably be regarded as bringing Link into disrepute. This would include publicly making any derogatory comments about the organisation, its employees, workers or volunteers, governing body members, service users, partners and anyone that we are doing business with.

I will discuss any grievance or concern that I have about an employee, worker, volunteer or Board member with my line manager or with Human Resources. I understand that I can refer to Link's Grievance Policy for further information.

- C.13** I will always be a positive ambassador for Link and our work, especially when attending events as a Link employee, worker or volunteer or in dealing with outside bodies.

Showing respect for others

- C.14** I will always treat others with courtesy and respect. I will consider and respect the views of others.
- C.15** I will adhere to both the letter and the spirit of our Equality, Diversity and Inclusion Policy and our Dignity at Work Policy. See also **A.15** about the need to avoid discrimination of any kind.
- C.16** I will always conduct myself in a courteous and professional manner. I will not, by my actions or behaviour, cause distress, alarm or offence.
- C.17** I will not harass, bully or attempt to intimidate any person.
- C.18** I will take care when displaying materials in the office and ensure that these would not reasonably cause offence to your colleagues. If I am in any doubt, I consult my line manager before displaying any materials.
- C.19** When attending meetings, I will be courteous to all attendees and respect the position of the meeting chair or convenor.

6. LOCAL PARTNER VARIATION

This intra group policy applies across Link and its partner organisations. There is one version of this policy and local partner variation (if applicable) will apply as follows;

- N/A

7. MONITORING OF THE POLICY

Any matter which demonstrates a serious failure of internal controls should be reported immediately to the Chief Executive. This policy will be monitored as follows:

- Cases of misconduct are monitored by Human Resources and numbers of cases reported to partner management teams on a monthly basis.
- On a six monthly basis, statistics showing the number of misconduct cases in partner areas are reported to the relevant Board.
- In individual cases of misconduct, where it is identified further reinforcing of the Code of Conduct, policies or procedures is required, such recommendations are made.

8. COMPLAINTS AND APPEALS

Link Group and partners welcomes complaints and positive feedback, both of which provide information which helps us to improve our services. We use a complaints handling procedure (CHP) developed by the Scottish Public Services Ombudsman (SPSO) and the Scottish Housing Regulator.

The CHP allows for most complaints to be resolved by front line staff within a five day limit (first stage), or if the complaint is complex, a detailed investigation will be made by a manager within a 20 day limit (second stage). At the end of the second stage our response will be made by a director. If the customer remains dissatisfied he/ she may then refer the matter to the SPSO.

The SPSO does not normally review complaints about our factoring service. If a factoring customer is dissatisfied after using the CHP, the complaint may be referred to the First-tier Tribunal (Housing and Property Chamber).

Anyone receiving care or support service from us has the right to complain either direct to the Care Inspectorate or to us.

At each stage Link Group and partners will advise the customer how the complaint should be taken forward, and advise which agency would be most appropriate to consider the case.

Link recognises that employees, workers and volunteers may have issues or concerns about their work, the environment or working relationships that they may wish to raise and have addressed. Employees, workers and volunteers are encouraged to raise a concern, in the first instance, with their line manager in an attempt to resolve the matter informally. Should this course of action prove unsatisfactory, however, an employee may raise a formal grievance. Workers should use the Grievance Procedure for Workers.

9. POLICY AVAILABILITY

A summary of this policy can be made available in other languages and formats on request.

10. POLICY REVIEW

Link and Group Members undertake to review this policy regularly, at least every 3-5 years, with regard to:

- Applicable legislation, rules, regulations and guidance
- Changes in the organisation
- Continued best practice

11. POLICY IMPLEMENTATION CHECKLIST

- Policy will be published on Linkipedia and database records updated
- Relevant staff teams will be sent a copy of this policy and briefed on key changes
- Procedures accompany this policy and are published
- If staff training is needed Learning and Development will be contacted
- This policy should be sent to staff as a mandatory read

12. DATA PROTECTION IMPACT ASSESSMENT SCREENING

Carrying out a Privacy Impact Assessment [PIA] will be useful to any project – large or small – that:

- Involves personal or sensitive data about individuals
- May affect our customers' reasonable expectations relating to privacy
- Involves information that may be used to identify or target individuals

A Data Protection Impact Assessment [DPIA] (also known as Privacy Impact Assessment [PIA]) must be completed if the policy involves one or more of the following (please tick each that apply to this policy):

- evaluation or scoring;
- automated decision-making with significant effects;
- systematic monitoring;
- processing of sensitive data or data of a highly personal nature;

- processing on a large scale;
- processing of data concerning vulnerable data subjects;
- innovative technological or organisational solutions;
- processing that involves preventing data subjects from exercising a right or using a service or contract.
- use systematic and extensive profiling or automated decision-making to make significant decisions about people;
- process special-category data or criminal-offence data on a large scale;
- systematically monitor a publicly accessible place on a large scale;
- use innovative technology in combination with any of the criteria in the European guidelines;
- use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit;
- carry out profiling on a large scale;
- process biometric or genetic data in combination with any of the criteria in the European guidelines;
- combine, compare or match data from multiple sources;
- process personal data without providing a privacy notice directly to the individual in combination with any of the criteria in the European guidelines;
- process personal data in a way that involves tracking individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines;
- process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them;
- process personal data that could result in a risk of physical harm in the event of a security breach.
- there is a change to the nature, scope, context or purposes of our processing.
- If a DPIA is not carried out, please summarise the reasons below:

Monitoring of misconduct cases is undertaken within Human Resources and statistics (only) provided to management teams and Boards. No individuals are identified through this reporting.

13. EQUALITY IMPACT ASSESSMENT SCREENING

Will the implementation of this policy have an impact on any of the following protected characteristics?

- | | | |
|--------------------------------|------------------------------|--|
| Age | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Disability | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Gender reassignment | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Marriage and Civil Partnership | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Pregnancy and Maternity | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Race | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Religion or belief | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Sex | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| Sexual orientation | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

If you have answered 'Yes' to any of these points, please complete a full Equality Impact Assessment. If you have answered 'No', you need take no further action in completing an Equality Impact Assessment.

Appendix 1

Declaring and Managing Personal Interests

If a member of staff has any clear and substantial financial or non-financial interest, direct or indirect, in any matter under his or her consideration he or she must, at the earliest possible opportunity, disclose the fact, whether or not that interest is included in the Register of Interests.

1. Introduction

- 1.1 Being an employee, worker and/or volunteer of Link 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 an employee, worker or volunteer.
- 1.2 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.
- 1.3 Any potential conflict between your position as an employee, worker and/or volunteer and your other interests must be openly declared and effectively managed so as to protect the good reputation of Link and the RSL sector.
- 1.4 As stated in the Code (provision **B1**) where you have a personal business or financial interest in any matter that is relevant to our activities or is being considered (or is likely to be considered), or you know that someone to whom you are closely connected has such an interest, you must declare it promptly and record it in the Register of Interests.
- 1.5 This Appendix gives further guidance on how to declare and manage any personal (including personal business or financial) interests.

2. Examples of interests that must be declared

- 2.1 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 care or support services from us.
 - Membership of a community or other voluntary organisation that is active in the area(s) we serve.

- 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 RSL.
- Being an elected member of any local authority where we are active.
- If you purchase goods or services from us.
- If you purchase goods or services from one of our contractors or suppliers.
- 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 (i.e. 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 or occupancy agreement or a contractual dispute over the provision of goods or services with us.

2.2 If you are not sure whether a certain matter needs to be declared, you must seek guidance from your manager or from Human Resources. If doubt remains, the advice would always be to declare the matter.

2.3 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.

3. Definition of 'close connection'

3.1 Someone 'closely connected' to you includes family members and persons who might reasonably be regarded as similar to family members even where there is no relationship by birth or law.

3.2 As well as considering your own actions, you must be aware of the potential risk created by the actions of people to whom you are closely connected. Who you should consider, and our expectations of you to identify and declare such actions are outlined in Table A below.

Table A

Group	Required Response
<p>1. Members of your household</p> <p>This includes:</p> <ul style="list-style-type: none"> • Anyone who normally lives as part of your household (whether related to you or otherwise) • Those who are part of your household but work or study away from home 	<p>We expect you to be aware of and declare any relevant actions of all people in your household. You must take steps to identify, declare and manage these.</p>
<p>2. Partner, Relatives and friends</p> <p>This includes:</p> <ul style="list-style-type: none"> • Your partner (if not part of household) • Your relatives and their partners • Your partner's close relatives (i.e. parent, child, brother or sister) • Your close friends • Anyone you are dependent upon or who is dependent upon you • Acquaintances (such as neighbours, someone you know socially or business contacts/associates) 	<p>Where you have a close connection and are in regular contact with anyone within this group, we expect you to be aware of and declare any relevant actions. Under these circumstances, you must take steps to identify, declare and manage these actions.</p> <p>Where you do not have a close connection and regular contact with someone in this group, we do not expect you to be aware of or to go to unreasonable lengths to identify any relevant actions. However, if you happen to become aware of relevant actions by such individuals, then these should be declared and managed as soon as possible.</p>

What You Need To Consider

3.3 The following are the relevant actions /involvement by those to whom you are closely connected that you should consider, declare and manage as per our expectations outlined in Table A:

- A significant interest in a company or supplier that we do business with. A significant interest means ownership (whole or part) or a substantial shareholding in a business that distributes profits, but does not include where an individual has shares in large companies such as banks, utility companies or national corporations, i.e. where owning shares would not give the individual any significant influence over the activities of that organisation.

- Where the individual may benefit financially from a company with which we do business
- Involvement in the management of any company or supplier with which we do business
- Involvement in tendering for or the management of any contract for the provision of goods or services to us.
- Application for employment with us.
- Application to join our Board or any of its subsidiaries
- Application to be a tenant or service user of the organisation
- If they are an existing tenant or service user of the organisation

4. Declaring personal interests

- 4.1 An employee would be required, on appointment, to complete a form to register any personal interests that could potentially conflict with their role and thereafter to complete a new form.
- 4.2 As stated in the Code (provision B2), you must keep your entry in the Register of Interests up to date, add any new interests as soon as they arise, and amend existing interests as soon as any change takes effect.
- 4.3 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 an employee, volunteer or worker– both internal and external.
- 4.5 Any failure to make a complete, accurate and prompt declaration - whether deliberately or through taking insufficient care - will be regarded as a breach of this Code.

Appendix 2

Breach of the Code

As an employee, worker and/or volunteer, you have a responsibility to promote and uphold the requirements of this Code and any other Code that your membership of a relevant professional body imposes. If you consider that you may have breached this Code, or have witnessed or become aware of a potential breach by another employee, volunteer or worker, you should immediately bring the matter to the attention of your manager or to Human Resources.

Any material breach of the Code will be considered under the relevant Disciplinary Policy and Procedures and may result in a disciplinary action being taken, which may include dismissal or the termination of your contract with us

As an employee, worker and/or volunteer, you have a duty to co-operate with and contribute to any investigation relating to a potential breach of the Code or an associated matter.

You must sign the below statement of acceptance once you have read and understood this Code and its requirements.

Statement of Acceptance and Signature

I have read and understood the terms of this Code of Conduct and I agree to uphold its requirements in all my activities as an employee, worker and/or volunteer of Link.

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 Link's Disciplinary Policy and Procedures and could ultimately result in my dismissal or the termination of my contract with Link.

Signed _____

Date _____

