



**THE EASTLIGHT
CODE OF
CONDUCT**

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1. Introduction

- 1.1** It is vital for the reputation of the social housing sector that everyone who works for, or represents, a housing association is held to the highest standards of conduct.
- 1.2** This Code of Conduct sets standards appropriate for housing associations that are members of the National Housing Federation (NHF), such as Eastlight.
- 1.3** The Code applies to individual staff – including interim staff – contractors, Board and Committee Members, volunteers and involved residents.
- 1.4** This Code is a companion document to the NHF Code of Governance (2020), and the two are designed to be used in conjunction with one another. We have sought to make sure there is no duplication between the two documents.
- 1.5** The Board adopted the principles of the NHF Code of Conduct and expect the code to be adhered to by all those it applies to.

2. Responsibilities of Eastlight’s Board

- 2.1** Eastlight’s Board is ultimately responsible for the actions, policies and work of the association. It is their responsibility to make sure that all those concerned comply with this Code.
- 2.2** The Board and Senior Leadership Team have a responsibility to set an appropriate framework of policies, delegations and procedures.
- 2.3** A culture must be promoted which enables and supports all individuals to meet their responsibilities, as set out in the Code, and deliver the best possible service for residents and customers.
- 2.4** For further information or guidance about the application or detail of this Code, please contact thepeopleteam@eastlighthomes.co.uk.

3. How the Code is Structured

- 3.1** The Code is split into four main parts, each embodying a key theme arising from the core purpose and values of Eastlight. The four parts of the Code are:
- 3.2 Part One: Acting in the Best Interests of Eastlight and its Residents**
 - 3.2.1 You have a responsibility to carry out your role in line with Eastlight’s social purpose.
- 3.3 Part Two: Behaving with Integrity**
 - 3.3.1 The reputation and good name of Eastlight depends in part on compliance with this Code, and with the laws, policies and procedures that it refers to. The integrity of those involved needs to be beyond doubt and seen to be so.
- 3.4 Part Three: Conducting Yourself Professionally & Treating Others Well**
 - 3.4.1 Professionalism, consideration and respect for others, and a commitment to the principles of equity, diversity and inclusion, are fundamental to the delivery of social purpose.
- 3.5 Part Four: Protecting Yourself, Others & the Environment**
 - 3.5.1 You have a responsibility, while on Eastlight’s business, to protect your own health, safety, security and wellbeing and that of others, and, where reasonable, to make the most positive environmental impact possible.
- 3.6** Each part of the Code comprises a set of principles and detailed expectations. Where its requirements apply differently to different groups (Board Members, involved residents and staff), subheadings within the relevant section are used to distinguish between them.

4. Application of this Code

- 4.1** The Code cannot cover every situation in which people may find themselves, as they perform in their roles.
- 4.2** You need to apply good judgement, even where the Code does not contain specific requirements and guidance.
- 4.3** It is always important to consider how any action taken or decision made aligns with Eastlight’s purpose and values, and what impact it may have upon residents and reputation (for example, “Think Customer”).
- 4.4** The application of this Code is supported by Eastlight’s policies and procedures.

5. Compliance with this Code

- 5.1 We require staff – including interim staff – contractors, Board and Committee Members, volunteers and involved residents to comply with this Code and to be accountable for their behaviour and actions.

6. Legal Requirements & Policies

- 6.1 The Code is written on the assumption that those using it will comply with all legal and regulatory requirements relevant to this Code and with all of Eastlight’s policies, procedures and any employment contracts or deed of agreement for services.

7. Who Does the Code Apply to?

- 7.1 The Code sets the standards of conduct for people who are involved with Eastlight, such as staff – including interim staff – contractors, Board and Committee Members, volunteers and involved residents.
- 7.2 If a member of staff who has a contract of employment or Board or Committee Member, who has a deed of agreement for service, is in conflict between their contract/deed and this Code, the contract/deed takes precedence.

8. Terminology Used in this Code

8.1 Board

- 8.1.1 ‘Board’ includes any Board of Management, management committee, Board of Trustees, and all similar governing bodies, however named.

8.2 Board & Committee Members

- 8.2.1 Board and Committee Members is a catch-all term used when we want to collectively describe those who are appointed to the Board or one of the Board’s delegated Committees. For individual and more comprehensive definitions see our [Board & Committee Membership Policy](#).

8.3 Contractors

- 8.3.1 ‘Contractors’ includes those other than Board Members, staff and involved residents who are directly involved in delivering Eastlight’s business activities. This includes contractors, sub-contractors, consultants and agents.

8.4 Involved Resident

8.4.1 'Involved Resident' includes residents and other customers (as defined below) who are formally involved in delivering or scrutinising Eastlight's business activities.

8.5 Known Relationship

8.5.1 For the purposes of this Code, 'Known Relationship' means related parties and close connections. It is not envisaged that relationships with acquaintances should be covered by this term.

8.6 Microaggression

8.6.1 'Microaggression' is a term used for brief and common place verbal, behavioural or environmental slights that may communicate hostile, derogatory or negative attitudes towards certain groups of people.

8.7 People with Whom You Are Closely Connected

8.7.1 In broad terms, this means your family, relatives or business partners, as well as businesses in which you have an interest through ownership or influence. The term includes your spouse or unmarried partner or civil partner, children, siblings, grandchildren and grandparents.

8.8 Residents & Other Customers

8.8.1 This means residents, tenants, leaseholders, shared owners and users of other services provided by Eastlight.

8.9 Staff Member ('Staff')

8.9.1 'Staff Members' includes Eastlight's employees and any other persons fulfilling the role of a paid employee, such as those deemed to be workers, interim placements, or those on secondment from another organisation.

9. PART ONE: Acting in the Best Interests of Eastlight and its Residents

9.1 You have a responsibility to discharge your role in line with the purposes and values of Eastlight.

9.2 A) Meeting Your Responsibilities

9.2.1 The Principle:

- You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of Eastlight, and for the delivery of its strategic objectives.

9.2.2 Expected of All:

- **A1:** You must always try to fulfil the requirements of your role to the best of your ability. If any circumstances arise that limit your ability to meet your responsibilities, you must raise this through the appropriate channels
- **A2:** In carrying out your role, you must always seek to further Eastlight's strategic objectives, reflecting Eastlight's desired culture
- **A3:** You must not act in a way that discriminates against, or unjustifiably favours, particular individuals, groups or interests, including on the basis of any protected characteristics they may have
- **A4:** You must consider the impact of your actions on the safety and wellbeing of residents.

9.2.3 Expected of Board Members:

- **A5:** You must respect the principle of collective decision-making and corporate responsibility
- **A6:** You must ensure that you declare to Eastlight any relevant personal relationships, employment and other appointments you hold, and that these do not interfere with your ability to perform or conflict with your role as a Board Member.

9.2.4 Expected of Staff Members:

- **A7:** You must consult your manager before taking any other paid or voluntary work that may interfere with your existing job, or conflict with terms set out in your contract of employment.

9.3 B) Representing Eastlight

9.3.1 The Principle:

- In representing Eastlight in any capacity, including at external events, in dealings with outside bodies and on social media, you are an ambassador for Eastlight and must uphold and promote its values, objectives and policies.

9.3.2 Expected of All:

- **B1:** In representing Eastlight, you must act in accordance with its values, policies and goals
- **B2:** You must not conduct yourself in a manner that could reasonably be regarded as bringing Eastlight into disrepute
- **B3:** You must not make derogatory, false or otherwise damaging comments, in-person or through any medium, about Eastlight or any person, service or organisation connected with it
- **B4:** You must not seek to officially represent the views or position of Eastlight without prior authority
- **B5:** You must adhere to Eastlight's policies in the use of AI, email, intranet and internet services, including social media
- **B6:** When representing Eastlight through any medium, including social media, you must at all times act with professionalism
- **B7:** Where any personal social media accounts refer to your role with Eastlight, you must make it clear in what capacity you are communicating
- **B8:** If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect Eastlight, you must obtain prior consent. Such consent must not be unreasonably withheld, unless your activity poses a material risk to Eastlight.

9.3.3 Expected of Board Members:

- **B9:** Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or long-standing, and in the opinion of the Board cannot be managed appropriately.

10. PART TWO: Behaving with Integrity

10.1 The reputation and good name of Eastlight depends on compliance with this Code, and with the laws, policies and procedures that it refers to. The integrity of those involved needs to be beyond doubt and seen to be so.

10.2 C) Conflicts of Interest

10.2.1 The Principle:

- You must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between your duties to Eastlight and your personal interests, other duties and relationships.

10.2.2 Expected of All:

- **C1:** You must formally declare to Eastlight, at the earliest opportunity, any interests which may, or may be perceived to, or may in the future, conflict with the duties of your role
- **C2:** You must declare any known relationship to a person applying for or performing a role within Eastlight and must not be involved in their appointment, performance management or reward
- **C3:** You must declare any known relationship with a resident, potential resident or other customer of Eastlight. You must not be involved in decisions relating to their relationship with Eastlight, or seek or accept preferential treatment for them
- **C4:** You must declare any known relationship with a person or organisation seeking appointment as a contractor or supplier to Eastlight and must not be involved in their appointment, performance management or reward
- **C5:** Except where specifically permitted, as set out in Eastlight's policies, you must avoid using its contractors and suppliers for private purposes
- **C6:** You must not use, or attempt to use, your position to promote personal interests or those of any connected person, business or other organisation for personal gain.

10.2.3 Expected of Board Members:

- **C7:** Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or long-standing, and in the opinion of the Board cannot be managed appropriately.

10.3 D) Bribery, Gifts & Hospitality

10.3.1 The Principle:

- In your role with Eastlight, you must not offer, seek or accept bribes or inducements to act improperly or corruptly
- You must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity, or place you under an obligation to those individuals or organisations
- You must not seek or accept preferential treatment in the provision of benefits such as housing accommodation or employment.

10.3.2 Expected of All:

- **D1:** You must not solicit or seek gifts or hospitality or other benefits
- **D2:** Any gifts or hospitality offered to or by you must be either declared or declined according to Eastlight's Gifts & Hospitality Policy
- **D3:** If you are offered a bribe, hospitality or a gift, which is or may be in return for expected preferential treatment, you must decline and declare this immediately to the appropriate person.

10.4 E) Funds, Resources & Personal Benefit

10.4.1 The Principle:

- You must not misuse Eastlight's funds or resources or seek preferential treatment for your own personal benefit.

10.4.2 Expected of All:

- **E1:** You must ensure that Eastlight's funds and resources are used properly and efficiently
- **E2:** Your procurement decisions must be guided by Eastlight's policies, ensure fairness in decision-making and in line with relevant law
- **E3:** You must take all reasonable measures to protect Eastlight's funds, resources, property and assets from fraud, theft, damage and misuse
- **E4:** If you claim reimbursement for any expenses, you must do so in line with Eastlight's Expenses policies and procedures.

10.5 F) Confidentiality

10.5.1 The Principle:

- You must process information in accordance with the law and Eastlight's policies and procedures.

10.5.2 Expected of All:

- **F1:** You must not disclose, without the required permission and authority, any personal data about tenants, customers, staff or colleagues
- **F2:** You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left Eastlight or stepped down from your position
- **F3:** You must not, without authority, pass or distribute to the press or media or any other external recipient(s) any unpublished information or materials relating to Eastlight, unless you are doing so in accordance with Eastlight's Whistleblowing Policy and procedure
- **F4:** You must not prevent another person from gaining access to information to which they are entitled to by law.

10.6 G) Reporting Concerns

10.6.1 The Principle:

- You must report to the appropriate person within Eastlight any reasonable suspicions you have about possible wrongdoing in line with Eastlight's relevant policies and procedures.

10.6.2 Expected of All:

- **G1:** If you have a concern about possible wrongdoing, you must immediately report it via the appropriate internal channel or external body. This includes becoming aware of potentially dishonest or fraudulent activity, and material breaches of this Code or relevant legislation, including health and safety
- **G2:** If you believe that you are being told and required to act in a way which conflicts with this Code or legislation, you must immediately report it via the appropriate channel
- **G3:** You must not victimise or disadvantage any person who uses or intends to use Eastlight's confidential reporting (whistleblowing) procedures to report actual or alleged wrongdoing.

11. PART THREE: Conducting Yourself Professionally & Treating Others Well

11.1 Professionalism, consideration and respect for others, and a commitment to the principles of equity, diversity and inclusion, are fundamental to the delivery of social purpose.

11.2 H) Respect for Others

11.2.1 The Principle:

- You must treat all others with respect and consideration.

11.2.2 Expected of All:

- **H1:** You must treat everyone you meet in the performance of your role with equal respect, care and consideration
- **H2:** You must show respect for individuals' chosen identities
- **H3:** You must promote, through your own behaviours, an organisational culture that is welcoming, accepting and accommodating to people of all backgrounds, cultures and personal and protected characteristics
- **H4:** You must not harass, bully or attempt to intimidate any person, or use threatening or aggressive behaviour or other discriminatory behaviours. You must seek to avoid microaggressions in your speech and behaviour
- **H5:** You must not display materials in your workplace or use language in the performance of your role which other people might reasonably find offensive
- **H6:** You must report through appropriate channels any instances of unfair or unequal treatment in the workplace and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and while respecting confidentiality.

11.3 I) Working with Residents & Other Customers

11.3.1 The Principle:

- You must be professional, fair and courteous in all your dealings with residents and other customers.

11.3.2 Expected of All:

- **I1:** You must seek and value views from residents and other customers when making decisions that will affect them

- **I2:** You must not allow any personal relationship with a resident or other customer to influence how you discharge your role and responsibilities
- **I3:** You must not give personal gifts or loans of money to, or receive personal loans or gifts of money, from residents or other customers
- **I4:** You must handle residents' and other customers' money only where absolutely necessary, and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with Eastlight's financial policies, procedures and controls to ensure appropriate handling of any and all funds
- **I5:** You must not invite or influence a resident or other customer, unless they are a person who you are closely connected to, to make a will or trust under which you are named as executor, trustee or beneficiary
- **I6:** You must fully consider how residents or other customers will experience and be impacted by the service we provide. Before acting, you are required to think about:
 - The short and long-term effects of your actions
 - The residents' individual needs and preferences
 - Whether your communication is clear, respectful and appropriate
 - Any past insights or experiences to help you when making decisions
 - Whether you, yourself, would be happy with the service being provided.
- **I7:** Your actions in respect of the service you provide residents and other customers should always be respectful and appropriate.

11.4 J) Professional Relationships

11.4.1 The Principle:

- Board Members, staff and involved residents must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.

11.4.2 Expected of All:

- **J1:** You must not ask or encourage the commitment of wrongdoing, including any breach of this Code.

11.4.3 Expected of Board Members:

- **J2:** Your relationships with staff and involved tenants must be constructive and professional
- **J3:** You must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies and objectives

of Eastlight.

11.4.4 Expected of Board Members & Involved Residents:

- **J4:** Where it is necessary to raise issues of staff, Board or contractor performance, these must be raised constructively and through the appropriate channels
- **J5:** You must not undermine or appear to undermine the authority of a Manager or Senior Leader in his or her dealings with a more junior member of staff
- **J6:** You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with members of staff
- **J7:** Unless you have specific and, where practicable, written delegated authority to do so, you must not individually give instruction or direction to any member of staff or contractor.

11.4.5 Expected of Staff Members:

- **J8:** You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding, in a professional setting, inappropriate personal familiarity with Board Members and involved residents
- **J9:** You must not use informal channels to lobby or influence Board Members or involved residents on matters of Eastlight's business
- **J10:** You must not knowingly mislead the Board or any of Eastlight's committees or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.

11.5 K) Learning & Development

11.5.1 The Principle:

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

11.5.2 Expected of All:

- **K1:** You must play an active part in Eastlight's supervision and performance appraisal processes as applying to you
- **K2:** You must offer open and constructive feedback to others and invite feedback about your own performance
- **K3:** You must make your personal training and development needs relevant to your role known to Eastlight
- **K4:** Unless there are exceptional reasons, you must attend learning and development events as required.

11.5.3 Expected of Board Members:

- **K5:** You must keep your knowledge up to date in those areas in which you are a specialist, as well as keeping abreast of any matters relating to Eastlight and the wider social housing sector.

12. PART FOUR: Protecting Yourself, Other People & the Environment

12.1 You have a responsibility while on Eastlight’s business to protect your own health, safety, security and wellbeing and that of others, and to minimise harmful environmental impacts.

12.2 L) Health, Safety & Security

12.2.1 The Principle:

- Your conduct, actions and decision making must promote the health, safety, security and wellbeing of yourself or others.

12.2.2 Expected of All:

- **L1:** You must not knowingly put your own or others’ health, safety, security or wellbeing unnecessarily at risk
- **L2:** If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or a group of individuals connected with Eastlight, you must report this immediately through the appropriate channels.

12.3 M) Protecting the Environment

12.3.1 The Principle:

- Within your role at Eastlight, you must strive to avoid or reduce possible negative environmental impacts.

12.3.2 Expected of All:

- **M1:** In carrying out actions or making decisions in the performance of your role, you must consider the environmental impact of your decisions and where you are able, to achieve positive environmental outcomes.

12.3.3 Expected of Board Members:

- **M2:** You should consider the long-term environmental impact of your decisions.

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