

Colleague Code of Conduct



We not me



**We do what we
say we will**



We care



**We do the
right thing**



**We love to
learn**

As a housing and care business providing services every day to our residents and people in our local communities, it is essential that we all **act with integrity at all times**. We operate in a regulated environment, receive public funds, and must comply with the law and regulatory requirements. Our residents, partners and communities **need to be able to trust and rely on us** to do the right thing, even when it is difficult.

At Black Country Housing Group (BCHG), we want colleagues to work in an environment that engages, empowers and supports the delivery of excellent services. Our values capture the essence of who we are and how we work together to deliver for residents and communities.

Our values are introduced at induction and reinforced throughout your employment through performance conversations, learning and development, and the way we work day to day. They are brought to life through our behaviours framework The BCHG Way.

This Code also supports our compliance with the Regulator of Social Housing's **Competence and Conduct Standard** and reflects the Housing Ombudsman's expectation that landlords have a clear, accessible code of conduct for colleagues and contractors who interact with residents, including when visiting people's homes.

To make our values real, we need to be sure that everyone employed by BCHG and anyone representing BCHG is clear about the standards expected of them, and the behaviours that demonstrate those standards, **our reputation as a trusted service provider and employer depends on this**.

This Code of Conduct sets out the minimum standards and guidance that protect you, our residents and BCHG. It applies to all colleagues, agency workers, contractors and anyone acting on behalf of BCHG. Where a higher professional standard applies (for example through a regulated profession), you must meet the higher standard.

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PURPOSE, SCOPE AND PRINCIPLES

This Code sets out the standards of behaviour expected of anyone working for, or representing, BCHG. It supports our values, protects residents and colleagues, and helps us meet regulatory and legal expectations, including the Regulator of Social Housing's Competence and Conduct Standard.

1. **Put people first:** Act in the best interests of residents, colleagues and service users, providing a high-quality, reliable and safe service.
2. **Act with integrity and honesty:** Be truthful, avoid improper influence, and declare conflicts of interest.
3. **Behave professionally:** Treat people well, communicate respectfully, and maintain appropriate boundaries.
4. **Be fair, inclusive and respectful:** Make decisions consistently, without discrimination, and with sensitivity to individual circumstances.
5. **Be accountable and transparent:** Take ownership, keep clear records, explain decisions in plain language, and put things right.
6. **Use resources responsibly:** Protect BCHG assets, information and finances; prevent fraud, bribery and misuse.
7. **Protect safety and wellbeing:** Prioritise health, safety and safeguarding, especially when visiting homes or supporting vulnerable people.
8. **Keep learning:** Maintain competence through training, feedback and reflection; seek support early when unsure.
9. **Keep residents informed and involved:** Provide timely updates, explain what will happen next, and ensure residents understand progress and outcomes.

How to Use This Code

This Code of Conduct works alongside BCHG policies and procedures to set clear expectations for how we behave and how we make decisions. Some topics are covered in more detail in specific policies; where this is the case, the Code signposts you to the relevant documents. You are responsible for familiarising yourself with the policies that apply to your role.

If you are unsure what is expected of you, seek advice early. In most cases you should speak to your manager first; you can also contact the People team or the

relevant specialist team (for example safeguarding, health and safety, finance, ICT or data protection) depending on the issue.

Not following this Code may harm residents, colleagues or BCHG's reputation and may lead to disciplinary action, up to and including dismissal.

If you become aware of behaviour or practice that may breach this Code, policy, the law, or could put residents or colleagues at risk, you must raise it promptly and in good faith. Normally, raise concerns with your manager; if that is not appropriate, speak to another senior manager or the People team, or use the routes set out in BCHG's Speak Out Guidance and Whistleblowing Policy, BCHG is committed to ensuring concerns can be raised without fear of reprisal.

Our values and professional standards

We not me (Inclusivity) We are stronger when we work together as One Team. We collaborate, include, and support one another, valuing diverse perspectives and experiences. We put the customer at the heart of everything we do, recognising that different people need different things to thrive.

We do what we say we will (Accountability) We manage expectations and keep our promises. We take responsibility for our impact, acting with fairness and consistency. We build trust by holding ourselves accountable not only for what we deliver, but how we deliver it.

We care (Compassion) We listen and act with kindness, showing empathy and compassion for everyone. Whether it is our customers, colleagues, communities, or the environment, we lead with care, dignity, and respect.

We do the right thing (Transparency) We act with integrity and transparency and make fair and inclusive decisions. We speak up and stand up for what is right, even when it is uncomfortable, because equity and fairness matter.

We love to learn (Curiosity) We are curious and open to growth. We embrace feedback, capture learning, seek out new ideas and keep evolving to make even bigger impacts.

At BCHG, our values and "The BCHG Way" set expectations for how we work with residents, communities, partners and each other. This Code translates those values into professional standards of behaviour that everyone representing BCHG must follow.

- **Honesty:** We are truthful, accurate and straightforward. We do not mislead people, omit important facts, or record information inaccurately.
- **Respect and fairness:** We treat everyone with dignity, listen properly, communicate respectfully, and make decisions fairly and consistently, especially when people are upset, vulnerable or at risk.

- **Acting with autonomy:** We use good professional judgement within our role, policies and delegated authority, and we seek advice early when a situation is unclear or high risk.
- **Social responsibility:** We consider the wider impact of our actions on residents, communities and the environment, and we use BCHG's resources responsibly.

Quick decision-check: If you are unsure what to do, pause and ask:

1. Is it legal and in line with BCHG policy?
2. Is it consistent with our values and this Code?
3. Would I be comfortable explaining it to a resident, a colleague, or a regulator?
4. Could it create a conflict of interest or look unfair?

If the answer to any is no or I'm not sure, speak to your manager or the People team before acting.

Speaking up: We all share responsibility for raising concerns in good faith, including where conduct falls below the standards in this Code. BCHG expects concerns to be raised promptly and will support colleagues who speak up appropriately, in line with our Speak Out Guidance and Whistleblowing Policy.

Living the standards in practice (decision-making and escalation)

A code of conduct is most useful when it helps you make good decisions in real situations. BCHG expects colleagues to use professional judgement, stay within their delegated authority, and ask for support early where a situation is uncertain, sensitive, high risk, or could affect trust in BCHG.

- **Use delegated authority responsibly:** Only make commitments, approve spend, agree remedies or provide assurances where you are authorised to do so. If you are unsure, check before you commit BCHG.
- **Keep good records:** Record decisions, advice given, key conversations and outcomes accurately and promptly, using BCHG systems. Records should be factual, respectful and suitable for disclosure to a resident or regulator.
- **Handle mistakes openly:** If something goes wrong, raise it early, apologise where appropriate, take action to reduce harm, and help BCHG learn and improve.
- **Keep residents updated:** Provide regular, proactive updates, especially where there are delays or changes, and confirm outcomes when issues are resolved.
- **Escalate concerns:** Escalate urgently where there is a safeguarding risk, a safety hazard, potential fraud/bribery, data breach, serious service failure, or where you feel pressured to act against this Code.
- **Be consistent:** Similar cases should be handled in similar ways, while taking account of individual needs and vulnerabilities. Explain the reasons for your decision in plain language.



Resident interactions (including visiting people's homes)

When we interact with residents and customers we represent BCHG. We must be courteous, professional and respectful, and we must take particular care when entering someone's home. The standards below apply to colleagues, contractors and anyone acting on BCHG's behalf.

- **Identification and reassurance:** Give your name and role, show ID where issued, explain why you are there, and respect the resident's right to ask questions or refuse entry (unless there is an emergency power or legal authority in place).
- **Respect, dignity and professionalism:** Be mindful of tone, language, personal space and physical contact. Never behave in a way that could be experienced as intimidating, discriminatory, offensive or overly familiar.
- **Privacy and confidentiality in the home:** Avoid discussing personal information where others can overhear; do not view, photograph or share personal belongings/information unless it is necessary for your role and authorised.
- **Boundaries:** Maintain professional boundaries at all times. Do not accept cash gifts or loans; follow BCHG guidance on gifts/hospitality and report anything offered that could compromise trust.
- **Safeguarding and safety:** Follow safeguarding and health and safety procedures, including lone working requirements. Escalate immediately if you are concerned about a resident's safety or wellbeing, or if you feel unsafe yourself.
- **Accessibility and reasonable adjustments:** Communicate in a way the resident can understand and support access needs (for example, language, disability, health needs) in line with BCHG policy.

GENERAL STANDARDS AND RESPONSIBILITIES

You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of BCHG, our residents, service users, colleagues and communities. These standards apply at work and anywhere you may reasonably be seen as representing BCHG, and they support the competence, professionalism and conduct expected of regulated housing providers from October 2026.

Conflicts of interest and declarations:

You must take all reasonable steps to prevent actual, potential or perceived conflicts of interest between your BCHG role and your personal interests, including financial interests, relationships, outside work, voluntary roles, property matters, or interests held by close family members or people you live with. You must declare any conflict as soon as it arises, complete a Declaration of Interest at least annually, and update it whenever circumstances change. You may be asked to step back from a decision,

change responsibilities, or follow other actions to protect impartiality and trust in BCHG.

Financial conduct, procurement, bribery, gifts and hospitality:

You must use BCHG funds, property, time and resources responsibly, lawfully and for legitimate business purposes. If your role involves handling money, authorising spend, ordering goods or services, approving invoices, managing budgets, procurement activity, or handling residents' funds, you must follow BCHG's financial regulations, procurement requirements and delegated authority, keep accurate records, and be able to explain and evidence your decisions.

You must never misuse BCHG funds, assets, information, suppliers or relationships for personal gain, or allow others to do so. You must not create or approve payments, refunds, write-offs, remedies, purchases or commitments that are not properly authorised. BCHG is accountable for how it uses public, charitable and organisational funds, so you may be asked to demonstrate that decisions were lawful, fair, authorised, properly recorded and free from conflicts of interest.

You must never offer, request, agree to receive or accept a bribe, inducement, loan, fee, reward, favour, discount or other benefit that could influence, or be seen to influence, a BCHG decision. Gifts and hospitality must be reasonable, proportionate and transparent. Cash gifts must never be accepted. Gifts or hospitality over £10 must be recorded in the Gifts and Hospitality Register, and gifts over £50 may only be accepted on behalf of BCHG where the Executive Team agrees this is appropriate.

Please refer to BCHG's Probity Policy, Anti-Bribery Policy, Anti-Fraud Policy, Financial Regulations, Procurement Policy and Procedure, and Declaration of Interest Policy available on People Hub and SharePoint.

Confidentiality and data protection:

You must protect confidential, sensitive and personal information about BCHG, residents, service users, applicants, colleagues and partners during and after your employment. Access, use and share information only where there is a lawful basis, a clear work-related need, and proper authority. Share the minimum necessary information, use approved systems, and keep an appropriate record of what was shared and why.

You must not publish information about BCHG or disclose information outside BCHG without appropriate authorisation, unless required by law. If you receive a request for information, or you are unsure whether information should be shared, speak to your manager and/or the Data Protection Officer for advice.

Take care when speaking, emailing, printing or working in public or shared spaces. If you think information has been lost, accessed in error, sent to the wrong person, or disclosed inappropriately, report it immediately in line with BCHG procedures. Misuse of information may be treated as misconduct and could lead to disciplinary action or criminal investigation.

Please refer to BCHG's Data Protection Policy, Data Protection Guidance and Transparency Policy available on People Hub, SharePoint and the BCHG website as appropriate.

Respect, dignity and equality:

You must treat everyone with dignity, fairness and respect. Bullying, harassment, victimisation, discrimination, abusive language, intimidation or unfair treatment is not acceptable. Equality of opportunity, inclusion and reasonable adjustments must be considered in service delivery, recruitment, learning and development, purchasing and day-to-day working. Be mindful that behaviour, tone, physical contact, personal space and "banter" can be experienced differently by different people.

Please refer to BCHG's EDI Strategy, Equal Opportunities Policy and Dignity and Respect at Work Procedure available on People Hub and SharePoint.

Professional relationships and boundaries:

You must maintain constructive and professional relationships with Board members, colleagues, involved customers, residents, service users, contractors and partners. Keep clear boundaries, understand your role and authority, and do not use informal routes to influence decisions or create unfair advantage. Relationships that could create an actual, potential or perceived conflict of interest must be declared and managed appropriately.

Where your role involves contact with residents or service users, especially in their homes or where they may be vulnerable, you must avoid relationships or actions that could create dependency, favouritism, exploitation or personal benefit. You must not borrow from or lend money to residents or service users, accept personal financial benefit, make inappropriate personal or social contact, or become involved in wills, trusts or similar arrangements where you or someone connected to you could benefit.

If you have a close personal relationship with a colleague, contractor, supplier, applicant, Board member, resident or service user that could affect your work, you must tell your manager and record it as a Declaration of Interest. Relationships between managers and direct reports are actively discouraged because of the risk of real or perceived bias and must be disclosed immediately if they arise.

Please refer to BCHG's Probity Policy, Declaration of Interest Policy, Recruitment and Selection Policy and Procedure, and relevant customer-facing procedures available on People Hub and SharePoint.

Health, safety, safeguarding, alcohol, drugs and smoking:

Your conduct must not endanger the health, safety, safeguarding or security of yourself or others. You must report for work fit to carry out your duties safely and effectively, follow BCHG health and safety procedures, use equipment and PPE appropriately, and report hazards, incidents, near misses, safeguarding concerns and security concerns promptly. You must tell your manager if prescribed medication could affect your ability to work safely.

You must not work under the influence of alcohol or non-prescribed drugs, possess, use, supply or distribute illegal or non-prescribed drugs at work, or drink alcohol during working time or at BCHG workplaces. Where alcohol is served at an approved BCHG event or hospitality, colleagues must remain professional, lawful and safe. Smoking, vaping and e-cigarettes are not permitted on BCHG sites or in BCHG vehicles, other than in designated areas where applicable.

Please refer to BCHG's Health and Safety Policy, Safeguarding procedures and Smoke Free Policy available on People Hub and SharePoint.

Representing BCHG, outside activities and social media:

When representing BCHG, including at external events, meetings, in the community or online, you must uphold our values, act professionally and lawfully, and protect BCHG's reputation. Be clear about your role and authority, do not make commitments on BCHG's behalf unless authorised, and do not present personal views as BCHG's views.

Your activities outside work are your own, but you must declare and seek advice where they overlap with BCHG's interests or your role. This includes paid work, voluntary roles, trusteeships, directorships, public activities or other appointments. You need written permission from your Head of Service before taking another paid job while employed by BCHG.

When using social media, you must protect confidentiality, respect residents and colleagues, and avoid content or behaviour that could reasonably damage trust in BCHG or your working relationships. Do not share personal data, sensitive information, internal documents or case details, and do not use BCHG branding or speak on BCHG's behalf unless authorised.

Please refer to BCHG's Media Protocol and Social Media Policy available on People Hub and SharePoint.

Learning, development and competence:

In partnership with BCHG, you must take responsibility for maintaining your competence and professional practice. This includes completing mandatory training, engaging with learning and development opportunities, applying feedback, and keeping your knowledge up to date so you can provide safe, effective services.

Reporting concerns and speaking up:

You must report concerns, risks or wrongdoing promptly and in good faith. This includes suspected fraud, bribery, unsafe practice, safeguarding concerns, serious service failures, discrimination or harassment, data breaches, or pressure to act against this Code. Concerns should normally be raised with your manager; if that is not appropriate, use another senior manager, the People team, or the routes set out in BCHG's Speak Out Guidance and Whistleblowing Policy. BCHG will support colleagues who raise concerns appropriately and without malice.

Professional behaviour, communication and appearance:

You are expected to behave in a way that is appropriate to your role and working environment and reflects well on BCHG. This includes being punctual and reliable, using respectful language, maintaining professional boundaries, and taking care with physical contact, personal space and familiarity, particularly when working in residents' homes or with people who may be vulnerable.

All communication must be respectful, accurate, professional and appropriate to the audience. Use plain language, check understanding, adapt communication to individual needs, keep residents updated, manage expectations clearly, and close the loop once matters are resolved. Records should be timely, factual and suitable for scrutiny by a resident, colleague or regulator.

Our ethos is "Dress for your Day". You must present yourself in a way that is safe, professional and appropriate to your role and setting, including office work, site visits, residents' homes, community settings and external meetings. Wear any uniform, ID, name badge or PPE required for your role. Managers should explain role-specific requirements, and BCHG will consider reasonable adjustments where needed.

Please refer to BCHG's Probity Policy, Internet and Email Use Policy and EDI Strategy available on People Hub and SharePoint.

Environment:

We all have a duty to behave in a way that does not negatively impact the environment. Wherever possible, you should consider how you could work in a different or more efficient way to reduce your carbon footprint. This includes reducing paper usage and printing, switching off lights when not in use, avoiding unnecessary travel, and recycling where possible.

Please refer to BCHG's Environmental Strategy available on People Hub and SharePoint

IT, INFORMATION SECURITY AND USE OF RESOURCES

You must use BCHG systems, equipment and facilities responsibly, securely and primarily for business purposes. This includes laptops, mobile phones, tablets, lone-working devices, tools, uniforms, vehicles, systems and information. Limited, reasonable personal use may be permitted where policy allows, but it must not interfere with work, incur significant cost, expose BCHG to risk, or breach confidentiality, information security or professional standards.

You are responsible for taking care of the equipment and resources allocated to you, protecting passwords, preventing unauthorised access, completing required cyber awareness training, and reporting suspicious activity, loss, damage, repeated



accidents or security concerns promptly. If you use your own device for work purposes, you must follow BCHG's Bring Your Own Device requirements.

Please refer to BCHG's Network Security Policy, Mobile Device Policy and Internet and Email Use Policy on People Hub and SharePoint

Date Reviewed	June 2026	Next Review Date	June 2029
Consultation	Staff Forum, Residents	Reviewed By	Head of People
EIA	Complete	Responsible Officer	Head of People
DPIA	Complete	Approval By	Executive Team