

Group Code of Conduct

1.0 Overview

- 1.1 This Code applies to all colleagues, Non-Executive Directors, Committee Members and Involved Customers (including customer members of the Customer Experience Committee and members of Customer Voice), wherever they may be located.
- 1.2 This Code cannot aim to cover every situation in which you may find yourself as you perform your role. You need to apply good judgement even where this Code does not contain specific requirements. It is always important to consider how any action taken or decision made aligns with Coastline's purpose and values, and what impact it may have upon customers and Coastlines reputation
- 1.3 Involved Customers - residents, tenants, leaseholders, shared owners and users of other services provided by Coastline who are formally involved in delivering, or scrutinising Coastline's activities. It is intended that this Code applies to those customers who attend Board or Committee Meetings or Customer Voice members acting as a Scrutiny Panel. This Code does not apply to all other volunteers who instead are covered by the Volunteer Policy.

2.0 Background / Introduction

- 2.1 The Board have adopted the NHF Code of Conduct 2022 and this Coastline Code of Conduct incorporates the NHF Code in its entirety.
- 2.2 This Code applies to the Coastline Group and any references to Coastline throughout the Code are deemed to apply to all parts of the Group.
- 2.3 For the purposes of this Code, 'People with whom you are closely connected' in broad terms, 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."
- 2.4 This Code reflects the same structure as the NHF Code, being in four main themes, with the principle behind each theme described followed by detailed expectations;
- **PART I: Acting in the best interests of Coastline and its Customers**
 - Meeting your responsibilities
 - Representing Coastline
 - **PART II: Behaving with integrity**
 - Conflicts of interests
 - Bribery, gifts and hospitality
 - Funds, resources and personal benefit
 - Confidentiality
 - Reporting concerns
 - **PART III: Conducting yourself professionally and treating others well**
 - Respect for others
 - working with customers
 - Professional relationships
 - Learning and Development
 - **PART IV: Protecting yourself, other people and the environment**
 - Health, safety and security
 - Protecting the environment

- 2.5 Under each theme it is made clear which of these expectations apply to everyone and which are specific to either colleagues NEDs or involved customers.

3.0 PART I: Acting in the best interests of Coastline and its Customers

Meeting your responsibilities

The principle

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

Expected of all

- 3.2 You must uphold Coastline's values, namely:
- To put our customers first;
 - Being open, honest and accountable;
 - Strive to be the best; and
 - To value each other.
- 3.3 You have a general responsibility to act in the Coastline's interests at all times, rather than your own or other's interests and uphold the highest standards of integrity and ethics.
- 3.4 You must ensure that you are familiar with this Code of Conduct, the Coastline's policies and procedures applicable to your role and that you adhere to them at all times.
- 3.5 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.
- 3.6 In carrying out your role, you must always seek to further the delivery of the Coastline strategic objectives, reflecting Coastline's desired culture.
- 3.7 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.
- 3.8 You must consider the impact of your actions on the safety and wellbeing of Customers.

Expected of Board and Committee Members

- 3.9 You are expected to make every effort to attend meetings, but if unable to attend are asked to ensure that their apologies are forwarded to the Chair and Assistant Company Secretary in good time.
- 3.10 You are expected to read agenda papers before meetings and to contribute to discussion. You are also entitled if appropriate to raise items for inclusion on the agenda, with the Board or Committee Chair.
- 3.11 You must respect the role of the Chair, listen to and acknowledge the contributions of others.
- 3.12 This Code should be read in conjunction with Coastline's Standing Orders which detail the seven principles of public life recommended by the Nolan Committee – selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

- 3.13 You must respect the principle of collective decision-making and corporate responsibility.
- 3.14 You must ensure that you declare to Coastline 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 and/or Committee member.
- 3.15 As Charity Trustees Board members should act in Coastlines best interests (for example dealing with conflicts of interest), manage Coastlines resources responsibly (for example implement appropriate financial controls and manage risks) and act with reasonable care and skill (for example take appropriate advice when needed).

Commitment to Board and Committee Members

- 3.16 Coastline considers membership of the Board or Committee should be a mutually rewarding relationship. In return for the commitment of Non-Executive Directors and Committee members, Coastline will invest in their training, support and personal development. To assist in the performance of their duties, Coastline will:
- Treat Board and Committee members with respect;
 - Ensure private and confidential information about Board and Committee members and their professional lives is kept on that basis;
 - Recognise the privileged nature of sensitive correspondence between Board and Committee members and Coastline and ensure its confidentiality;
 - Undertake an annual training needs assessment;
 - Provide tailored induction programmes for new Board and Committee members;
 - Arrange an annual appraisal to assist Board and Committee members in planning their personal and professional development;
 - Offer opportunities for Board and Committee members to attend conferences and seminars relevant to the Coastline's work;
 - Promptly reimburse expenses in accordance with the Coastline's policies; and
 - Whenever possible, ensure that agendas and reports are circulated well in advance of meetings, minutes are accurate and so on.

Expected of Colleagues

- 3.17 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.

Coastlines Commitment to you

Commitment to Colleagues

- 3.18 Coastline considers that it has a responsibility to you as a member of its staff. In return for your commitment, Coastline will invest in your training, support and personal development. To assist you in the performance of your duties, Coastline will:
- Treat you with respect;
 - Value Equality, Diversity & Inclusion;
 - Ensure private and confidential information about you is kept on that basis;
 - Undertake an annual training needs assessment;
 - Provide tailored induction programmes for new staff;
 - Regularly meet to assist you in planning your personal development and maximising your potential;

- Ensure that you are paid promptly and accurately; and
- Seek to ensure that it is, in all respects, a brilliant place to work.

Involved Customers

- 3.19 All Involved Customers hold collective responsibility for decisions made in meetings. In the event that a customer disagrees with any decision made, they agree to abide by it and not to do or say anything to undermine the decision made.

Representing Coastline

The principle

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

Expected of all

- 3.21 In representing Coastline, you must act in accordance with its values, policies and goals.
- 3.22 You must not conduct yourself in a manner that could reasonably be regarded as bringing Coastline into disrepute.
- 3.23 You must not make derogatory, false or otherwise damaging comments, in person or through any medium, about Coastline or any person, service or organisation connected with it.
- 3.24 You must not seek to officially represent the views or position of Coastline without prior authority.
- 3.25 You must adhere to Coastline's policies in the use of email, intranet and internet services including social media.
- 3.26 When representing Coastline through any medium, including social media, you must at all times act with professionalism.
- 3.27 Where any personal social media accounts refer to your role with Coastline, you must make it clear in what capacity you are communicating.

If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect Coastline, you must obtain prior consent. Such consent must not be unreasonably withheld unless your activity poses a material risk to Coastline.

3.28 Expected of Board and Committee Members

- 3.29 Coastline operates in a highly competitive field and whilst, non-political itself, is in a political environment. It is therefore expected that Board and Committee members will respect the confidentiality of information gained by them in their capacity as Board or Committee member and will at all times act in Coastlines interests. Any individual political affiliations should be disclosed and kept entirely independent of Coastline activity.
- 3.30 Individuals with a conflict should not take part in Board and Committee 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.

4.0 PART II: Behaving with integrity

Conflicts of interests

The principle

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

Expected of all

- 4.2 The Group Probity Standards provides restrictions which apply to you as an employee or your close relatives. These restrictions may continue to apply for 12 months after your employment with Coastline has ended. If you require any advice, please contact the Head of Governance, Risk and Assurance.
- 4.3 If you have any doubt about whether you should make a declaration of interest, you must ensure that you formally raise the matter with your line manager, or with the Head of Governance, Risk & Assurance or Executive Team Member.
- 4.4 You must formally declare to Coastline, 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.
- 4.5 You must declare any known relationship to a person applying for or performing a role within Coastline and must not be involved in their appointment, performance management or reward. This includes declaring a relationship that develops between colleagues.
- 4.6 You must declare any known relationship to a Customer or potential customer of Coastline. You must not be involved in decisions relating to their relationship with Coastline, or seek or accept preferential treatment for them.
- 4.9 You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to Coastline and must not be involved in their appointment, performance management or reward.
- 4.10 Except where specifically permitted, as set out in Coastline's Probity Standard, you must avoid using its contractors and suppliers for private purposes.
- 4.11 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.

Expected of Board and Committee Members

- 4.12 You must disclose precisely any direct or indirect pecuniary interest or other interests which are not pecuniary but which could influence judgement or give the impression that the Board or Committee members was acting for personal motives. If the declaration is made at a meeting, they should withdraw from that part, unless specifically invited to remain;
- 4.13 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.

Bribery, gifts and hospitality

The principle

- 4.14 In your role with Coastline, 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.

Expected of all

- 4.15 You must not solicit or seek gifts or hospitality or other benefits.
- 4.16 Any gifts or hospitality offered to or by you must be either declared or declined according to Coastline's policies.
- 4.17 All gifts and hospitality, given and received, and whether or not accepted, must be recorded in the Gifts & Hospitality Register held by the Assistant Company Secretary.
- 4.18 Personal gifts of a significant monetary value must not be accepted.
- 4.19 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, in line with Coastline's policies.

Funds, resources and personal benefit

The principle

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

Expected of all

- 4.21 Ensure that your private and personal financial interests do not influence your decisions and that you do not use your position as a member of staff for material gain of any sort. Disclose precisely any direct or indirect pecuniary (financial) interest or other interests which are not pecuniary but which could influence your judgement or give the impression that you were acting for personal motives.
- 4.22 You must ensure that Coastline's funds and resources are used properly and efficiently, in accordance with the Group Contract Standing Orders and Group Financial Regulations.
- 4.33 Your procurement decisions must be guided by Coastline's policies and fairness in decision-making and in line with relevant law.
- 4.34 You must take all reasonable measures to protect Coastline's funds, resources, property and assets from fraud, theft, damage and misuse.
- 4.35 If you claim reimbursement for any expenses you must do so in line with Coastline's policies and procedures.

Confidentiality

The principle

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

Expected of all

- 4.37 You must not disclose, without the required permission and authority, any personal data about Customers or Colleagues.
- 4.38 You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left Coastline or stepped down from your position.
- 4.39 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 Coastline, unless you are doing so in accordance with Coastline's whistleblowing policy and procedure.
- 4.40 You must not prevent another person from gaining access to information to which they are entitled to by law.
- 4.41 You are expected to exercise judgement and prudence in using or accessing social networking sites or other social media, so that Coastline's interests and reputation are not put at risk and Colleagues are not disadvantaged.

Reporting concerns

The principle

- 4.42 You must report to the appropriate person within Coastline any reasonable suspicions you have about possible wrongdoing in line with the Whistleblowing Policy.

Expected of all

- 4.43 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.
- 4.44 If you believe that you are being required to act in a way which conflicts with this Code or legislation, you must immediately report it via the appropriate channel.
- 4.45 You must not victimise or disadvantage any person who uses or intends to use Coastline's confidential reporting (whistleblowing) procedures to report actual or alleged wrongdoing.

Expected of Colleagues

- 4.46 If a colleague has a complaint about a Board or Committee Members conduct, they would normally approach their line manager who in turn would escalate it to the Chief Executive Officer to raise the matter with the Chair, if necessary.

Expected of Board and Committee Members

- 4.47 If a Board or Committee Member has a complaint about another's conduct, they should raise it with the Chair or Vice Chair, who would normally discuss the matter with the Chief Executive Officer, before raising it (together if appropriate) with the individual concerned, citing any apparent breach of this Code of Conduct.

5.0 PART III: Conducting yourself professionally and treating others well

Respect for others

The principle

- 5.1 You must treat all others with respect and consideration.

Expected of all

- 5.2 You must treat everyone you meet in the performance of your role with equal respect, care and consideration.
- 5.3 You must show respect for individuals' chosen identities.
- 5.4 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.
- 5.5 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. (Microaggression is the expression used in the NHF Code for "brief and commonplace verbal, behavioural or environmental slights that may communicate hostile, derogatory, or negative attitudes towards certain groups of people.")
- 5.6 You must not display materials in your workplace or use language in the performance of your role which other people might reasonably find offensive.
- 5.7 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 respecting confidentiality

Working with Customers

The principle

- 5.8 You must be professional, fair and courteous in all your dealings with Customers.

Expected of all

- 5.9 You must seek and value views from Customers when making decisions that will affect them.
- 5.10 You must not allow any personal relationship with Customers to influence how you discharge your role and responsibilities.
- 5.11 You must not give personal gifts or loans of money to, or receive personal loans or gifts of money from Customers.

- 5.12 You must handle 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 Coastline's financial policies, procedures and controls to ensure appropriate handling of any and all funds.
- 5.13 You must not invite or influence a 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.

Professional relationships

The principle

- 5.14 Board Members, colleagues and Involved Customers must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.

Expected of all

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

Expected of Board and Committee Members

- 5.16 Your relationships with colleagues and involved customers must be constructive and professional.
- 5.17 You must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies and objectives of Coastline.

Expected of Board and Committee Members and Involved Customers

- 5.18 Where it is necessary to raise issues of staff, Board, Committee or contractor performance, these must be raised constructively and through the appropriate channels.
- 5.19 You must not undermine or appear to undermine the authority of a senior officer in his or her dealings with a more junior member of staff.
- 5.20 You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with any member of staff.
- 5.29 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.

Expected of Colleagues

- 5.21 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 Customers.
- 5.22 You must not use informal channels to lobby or influence Board Members or Involved Customers on matters of Coastline's business.
- 5.23 You must not knowingly mislead the Board (including subsidiary Boards) or any of Coastline's committees or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.

- 5.24 When working with customers, in particular vulnerable customers, colleagues should be follow the requirements of the Professional Boundaries guidance.

Learning and development

The principle

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

Expected of all

- 5.26 If you are new to Coastline or have taken a new role, you will be expected to participate in an induction programme
- 5.27 You must play an active part in Coastline's supervision and performance appraisal processes as applying to you.
- 5.28 You must offer open and constructive feedback to others and invite feedback about your own performance.
- 5.29 You must make your personal training and development needs relevant to your role known to Coastline.
- 5.30 Unless there are exceptional reasons, you must attend learning and development events as required.

Expected of Board and Committee Members

- 5.31 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 your association and the wider housing sector.

6.0 PART IV: Protecting yourself, other people and the environment

Health, safety and security

The principle

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

Expected of all

- 6.2 You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk.
- 6.3 If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or a group of individuals connected with Coastline, you must report this immediately through the appropriate channels, in accordance with the Safety, Health and Environment Policy.

Protecting the environment

The principle

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

Expected of all

- 6.5 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, seek to achieve positive environmental outcomes.

Expected of Board and Committee Members

- 6.6 You should consider the long term environmental impact of your decisions.

7.0 Links to other Policies

The following related policies, procedures and guidance are also relevant:

- Acceptable Use Policy;
- Complaints Policy;
- Data Protection Policy
- Equality and Diversity Policy;
- Gifts and Hospitality Policy;
- Group Contract Standing Orders;
- Group Financial Regulations
- Group Social Media Policy;
- Group Standing Orders;
- Probity Standard;
- Professional boundaries guidance
- SHE Policy;
- Safeguarding Adults Policy;
- Volunteer Policy; and
- Whistleblowing Policy

Declaration

I confirm that I will observe the requirements of the Company's Group Code of Conduct and understand that, if I breach those requirements or their spirit, I may be subject to disciplinary action.

Name:

Signed:

Date