



Our Work, Our Code of Conduct

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Our Values

We will be enterprising

We don't stand still; we welcome new ideas. We'll challenge ourselves to think differently and be innovative.

We will act with integrity

We are committed to being open and honest, and will hold ourselves and others to account. We will use our resources in areas that people have said are a priority.

We will take responsibility

If we promise something we will deliver it. We will always stand by our actions and be accountable.

We will be reliable and supportive

We will help residents in our communities to be confident and achieve. We will be dependable and reliable and listen to the concerns in our neighbourhoods. We will be welcoming and approachable recognising that everybody is an individual.

We will use our resources wisely

We will be organised but flexible and provide a professional service that provides value for money.

We live our values

As staff employed by STAR we are expected to act responsibly and in a manner that will reflect favourably on us and the company.

Our Approach

Our approach is our values in action; in the way that we approach our stakeholders, customers and interact with each other. They are our guide to the way we do things and our 4 golden rules of success.

Caring and Respect • We are here to make our customers lives better but there is more..... • We need to be approachable and polite and listen to what our customers say • We will show empathy and compassion for those that we come into contact with • We know that we need to show caring and respect not just in the words we use but, in our voice, and body language • We need to show we care about those that we deliver services to, by delivering services in a way that everyone at STAR can be proud of.	Keeping our Promises • Our reputation relies on us keeping our word to... • We will be realistic and honest about what we can achieve and then make sure we do what we say we will do • We will take personal responsibility for making sure that STAR • deliver what they promised and tell our customers what we have done • If something does go wrong we will be honest about any mistakes, say sorry and put it right as quickly as possible
Be Positive • Our colleagues, customer and communities rightly expect a lot from us, so we have a responsibility to be positive in our interactions with others as perceptions of the service is the reality so.... • We will be committed, and deliver services in a caring, respectful, friendly and professional way...the STAR way • We will be positive about STAR because we are positive about the work that we all do	Learning and Development • We pride ourselves in always trying to improve our services so... • We will do that by listening to our customers, learning from any mistakes we may make and constantly improving what we offer • We will listen to staff and tenants who suggest ways to improve our services • We will ensure that we invest in our staff so that they are better able to improve their service delivery • Our staff will succeed at STAR by taking the initiative and responsibility for what they do and their own development

We will carry out our work guided by our values and the four golden rules for achieving STAR success, and in compliance with this Code of Conduct, company policy and the law, statutory guidelines and regulations.

Implementing our Code

Accountability

This Code applies to all employees and is a statement of the principles and expectations that guide the conduct of our staff. We are all responsible for adhering to the values and standards set out in the Code, for compliance with STAR policies, procedures and standards and to raise questions if we are uncertain that the values of STAR are being met.

No employee may violate this Code or any company policy even if a supervisor directs you to do so. If your supervisor or line manager refuses to modify his or her request, contact a senior manager or use the Whistleblowing hotline.

Violations of the Code may result in action being taken and this may include disciplinary action up to and including the termination of employment. Note that these consequences may apply not only to employees who are guilty of misconduct but those who condone misconduct, fail to report or take reasonable measures to prevent, detect and address misconduct or attempt to retaliate against those who report potential misconduct.

Additionally, it is also expected that those providing services to and on behalf of STAR, for example, contractors and agency staff, will adhere to this code whilst working on behalf of the organisation.

This Code serves as a guide and is not intended to be an exhaustive description of STAR's policies, procedures and standards.

Supplementary information may be found by reference to relevant policies on our intranet. This code should be read in conjunction with any more detailed requirements as to conduct or processes to be followed issued by individual service areas and national conditions of service which are applicable to particular posts.

Transparency

Our tenants, other customers and stakeholders are entitled to know about how we conduct our business and so this Code will be made available to the public on the intranet at www.starhousing.org.uk

Set the tone at the top

We earn credibility with our tenants, other customers, stakeholders and colleagues by following our 4 Golden rules for STAR success. This includes 'Keeping our Promises'. We are all expected to act with honesty and integrity taking personal responsibility for what we have done.

We will pursue our company objectives solely through ethical and professional conduct.

If you are a supervisor or line manager there is an added responsibility of creating an open and supportive environment where employees feel comfortable asking questions, raising concerns and reporting misconduct.

Ethical behaviour does not simply happen; it is the product of clear and direct communication of our behavioural expectations, modelled by all those responsible for managing staff and demonstrated by example. It is the responsibility of our supervisors and managers to ensure that the expectations that we have of employees, both in terms of performance and conduct are met and managed.

SPEAK UP! Do the right thing because it's the right thing to do

Everyone should feel comfortable speaking his or her mind particularly with respect to ethical concerns. We must report suspected and actual violations of this Code, company policy and the law, statutory guidelines and regulations.

In deciding whether there are reportable violations ask yourself:

- Could this conduct be viewed as dishonest, unethical or unlawful?
- Could this conduct hurt STAR? Could it cause the Company to lose credibility with the Council, tenants, customers or other stakeholders?
- Could this conduct hurt other people whether it is tenants, customers or other employees?

If you answer 'yes' to any of the questions a potential issue has been identified that must be reported.

We recognise that deciding to report a concern can be difficult, not least because of the fear of possible reprisals. We will not tolerate victimisation and will take appropriate action to prevent this when a concern is raised in good faith.

For more information, see our 'Whistleblowing Policy' on the intranet.

Our expectations of staff

Outlined in the following section are a number of positive statements about how we are expected to carry out our work. These incorporate our 4 Golden rules for STAR success that are set out on page 4 and available on our intranet. Under each statement there is more detail about what this means and some further examples.

We should make sure that we are aware of the statements and what this means for us in our approach to our day to day work. The detail in each section is a good resource and highlights issues that we may come across in our day to day work and what we should do in a number of situations.

Our Expectations of Staff

We respect equality and diversity

We have developed a strategy for developing equality and diversity and this can be found on the intranet. In our **Equality and Diversity Strategy** we outline **our commitments** to equality and diversity. These are:

“We recognise that different people, communities and neighbourhoods have different needs and our aim is to treat everyone fairly.

We are committed to tackling discrimination, promoting equality of opportunities and valuing diversity in our organisation and in the communities and neighbourhoods we work in.”

The strategy states how we are all expected to put these commitments into practice. This includes

If you apply to us for a job or are already a member of staff we will:

- Recruit and promote staff solely on their merit, experience, ability and potential.
- Provide an environment appropriate to the needs of staff, making reasonable adjustments and adaptations where appropriate
- Provide training and other opportunities to help staff to develop their skills and talents.
- Provide the necessary equipment to staff to help them to do their job effectively
- Promote a culture that respects and values each other's differences and promotes dignity, equality and diversity
- Take prompt and effective action if staff face harassment at work.
- Advertise and promote our vacancies to encourage applications from individuals with protected characteristics or groups who are currently under-represented by the organisation.

We all have a responsibility to promote equality and diversity and ensure that our actions do not contribute to the unfair or discriminatory treatment of others. We must bring any unfair treatment to the attention of our line manager or supervisor. See the **Whistleblowing Policy**.

When we talk about **equality** we mean that we will make sure we treat everybody fairly and will not discriminate against anyone. We will treat them equally regardless of their sex, religion, age, disability, ethnicity, sexual orientation, gender reassignment, pregnancy or maternity, marriage or civil partnership status.

When we talk about **diversity** we mean we will respect and value differences (for example culture and family circumstances). This means:

By this we mean:

As an example, you may not display any pornographic, obscene or material that may cause offence through company systems, or in company premises or vehicles.

We will create a positive working environment

STAR will endeavour to provide an environment conducive to conducting business and allows individuals to excel, be creative, take the initiative, and seek new ways to solve problems, generate opportunities and be accountable for their actions.

You must comply with all reasonable instructions from your line manager. We also encourage teamwork to ensure that we make the best use of our talents and expertise collectively through effective collaboration and co-operation.

You are expected to follow our 4 golden rules for achieving STAR success. You do this by creating a climate of trust and respect, demonstrating expected behaviours in our work and promoting a productive work environment. This includes:

Caring and Respect: You are expected to be approachable and polite and listen to what our customers say, show empathy and compassion for all those that we come into contact with.

Be Positive: You have a responsibility to be positive in your interactions with others and to deliver services in a caring, respectful, friendly and professional way. You are expected to be positive about STAR in all interactions with residents and other stakeholders

Learning and Development: You listen to our customers, learning from any mistakes you may make and constantly improving what we offer. You will listen to staff and tenants who suggest ways to improve the service. You will take the initiative and responsibility for what you do and your own development.

We encourage open and honest communication. We do this by being receptive to the ideas and concerns of others and we offer and receive feedback constructively.

We will invest in our staff but you are expected to take responsibility for developing your work skills and for developing the expected behaviours.

This means:

You should avoid conduct outside of work that could impair work performance or affect the company's reputation or business interests.

Note that we require you to tell us if you are cautioned, convicted or reprimanded for any crime which may affect your ability to carry out your job or otherwise affect the company's reputation or business interests.

This means for example:

Q. At my 121 my manager gave me examples of where I had not considered my team members in the decisions I made. Can my manager say this as I am good at my job?

A. As well as working with staff to ensure that they perform their tasks well, managers will ensure that there is a positive working environment. This includes discussing with staff any actions may have had an adverse impact on the team as a whole to ensure that the team works well.

Keeping our promises: We will take personal responsibility for making sure that STAR deliver what they promised and tell our customers what we have done. If something does go wrong we will be honest about any mistakes, say sorry and put it right as quickly as possible.

We avoid conflicts of interest

Our reputation depends heavily on the actions and integrity of our employees. Relationships or activities that might impair, or appear to impair your ability to make objective and fair decisions when doing your job must be avoided.

You should not use STAR property for personal gain or take personal advantage of an opportunity that arises in the course of your work for the company.

Any potential or actual conflicts should be declared and a 'Declaration of Interests' form completed and given to your line manager or supervisor who will hold this on your personal file.

Conflicts of interest include:

Personal conflicts. You should not deal with any matter relating to the company where there is a relationship or previous relationship of any description. This includes relatives, family, friends or other close personal relationships.

Working with those with whom you have a relationship. You must inform your line manager if you have a close personal relationship with another employee which could be considered by colleagues, or others, as impacting on the way that you conduct yourself at work.

You may not directly supervise someone with whom you share a close personal relationship. If you supervise someone indirectly with whom you have a close personal relationship you may not use this personal relationship to influence or advance the interests of this person and it must be disclosed. Similarly, you should not be involved in individual decisions relating to recruitment, discipline; promotion or pay adjustments for any other employee with whom you share a personal relationship.

Employment outside STAR. You are entitled to work outside your employment with STAR but must ensure that this does not affect your ability to perform your contract fully. You must seek advice on whether permission is needed to undertake any other employment which could be considered a conflict of interest. Such permission will not be unreasonably withheld.

This means for example:

Q. I am dating a colleague who is being promoted to the Team Leader vacancy. Should I tell someone about this?

A. Yes. This could create a conflict of interest in the team. Even if you and your colleague are equals in the same team you should advise your manager of your relationship to prevent an inappropriate reporting relationship.

Q. I need to make extra money and I want to get a second job. Is this a problem?

A. This may create a conflict of interest if your second job provides any goods or services that we use or we provide or is a competitor of STAR

A conflict of interest could be taking work (either paid or unpaid) from any other organisation that is seeking to or supplies goods or services to us, or us to them, or is a competitor or working excessive hours that would affect their performance working for STAR

Activities outside of STAR. Many employees participate in a personal capacity outside of the organisation (e.g. a resident's association or school board). If during the course of these activities an issue arises that involves STAR, you must not discuss this issue or vote on the matter. You should disclose this conflict to the organisation involved and to us.

Political conflicts. STAR encourages its employees to participate in the political process. However, we are required in the course of our work to discuss matters with councillors, MPs and others about the impact of political policies which may be controversial. In such circumstances personal or political views are inappropriate and should be avoided. Senior managers may wish to take a position speaking on behalf of the organisation that may reflect a political view but this should be done with careful consideration to ensure that it reflects the views of the Board and the Company.

Personal political interests. Any personal political activities must be kept separate from the company. Any contributions to political campaigns or parties must expressly be in a personal capacity. Note that Directors and staff whose posts are graded PO11 or above are specifically barred from taking office as a councillor.

Contractors and suppliers. Any relationship with contractors or potential contractors should be declared where there is a close business or personal relationship now or in the past and you are directly involved in engaging or supervising contractors.

When we talk about a **close personal relationship** this means family or any strong, deep or close association or acquaintance between 2 or more people that may range in duration from brief to enduring. This association may be based on friendship, love, solidarity, regular business interactions, or some other type of social commitment.

Orders and contracts must be awarded on merit and no special favours shown such as awarding business to

This means:

Acting as a representative for STAR means that you are authorised to speak on behalf of the Company. Otherwise you are acting independently and STAR's name should not be used in connection with your participation.

those with whom we have a close business or personal relationship.

If you are involved in engaging or managing any contracts where you, or a close relative, has investment, you must declare an interest.

Separation of roles during tendering. If you are involved in the tendering process and dealing with contractors, you should be clear on the separation of client and contractor roles within the organisation. Senior employees who have both a client and contractor responsibility must be aware of the need for accountability and openness.

You must exercise fairness and impartiality when dealing with all customers, suppliers, other contractors and sub-contractors.

If you are privy to confidential information on tenders or costs for either internal or external contractors you should not disclose that information to any unauthorised party or organisation.

Gifts and Hospitality

Being offered or accepting a gift or hospitality from a tenant, resident, supplier, contractor or competitor may lead to a conflict or potential conflict of interest.

Do not accept any gift that is made to you personally in your day to day work.

Gifts and hospitality refused should be recorded in a central register held by the **PA to the Managing Director**. You must not obtain preferential treatment or accept gifts or special discounts of any kind that are offered to you, on the basis that you would or could persuade your service area or STAR to enter into a contract with a particular organisation.

You must be aware that it is a serious criminal offence to corruptly receive or give any gift, loan, fee, reward or advantage for doing, or not doing anything or showing favour, or disfavour, to any person in your official capacity.

The onus would be on you to disprove an allegation of corruption in relation to a gift, hospitality or favourable treatment from a person holding or seeking to obtain a contract, permission, tenancy, licence, consent, etc. from the company.

There are exceptional circumstances where gifts and hospitality can be accepted. For more information see our ***Gifts and Hospitality Policy*** on the intranet.

Personal purchases. Caution should be exercised when for personal use you buy goods or use the services of organisations that you know have dealings with STAR. You should not accept prices or terms for such goods or services that you believe may have been reduced for you personally because of the organisation's dealing with STAR; similarly, you should not seek such reductions.

This means for example:

Q. I have been given a bottle of wine as a thank you gift by a tenant. Can I keep it?

A. No personal gifts can be accepted. It should be refused saying that it is company policy not to accept personal gifts for the work you do. A gift offered and refused should be declared. Small gifts can be accepted if they can be used in the office or shared among colleagues e.g. pens from training events or a box of chocolates.

We provide a safe place to work

STAR are committed to establishing and managing a safe and healthy environment for our employees, our tenants and the public.

We are all responsible for ensuring that we:

- take reasonable care of our own and others safety and the safety of other persons who may be affected by our actions or omissions.
- help STAR fulfil their legal obligations by co-operating in all aspects of health and safety.
- wear personal protective equipment where required or when requested by your line managers or supervisors.
- do not intentionally misuse or interfere with safety equipment or protective clothing.
- do not allow visitors on site without appropriate clothing or protective wear.
- ensure that you and others you allow onto a site area notify the site manager/supervisor before doing so.
- ensure repairs to electrical equipment are only carried out by a qualified electrician.
- do not disable safety devices such as limit switches, relief valves, electrical and mechanical interlocks, guard or alarm devices. If you find equipment is not operating as intended, work must cease and you must report this to the appropriate person without delay.
- ensure that portable tools such as ladders and mechanical handling equipment are not used in a defective condition and the required user's checks are carried out before use; any defective equipment must be taken out of service and reported to the appropriate person.
- comply with the *Workplace Substance Misuse* policy (on the intranet).
- observe good housekeeping practices by ensuring that workplaces and eating areas are kept clean and tidy and access ways are kept clear.
- ensure fire exits and other means of escape are kept clear and fire precaution provisions are observed.
- familiarise ourselves with any emergency procedures and carry them out as required.
- observe Safety/warning signs.

We are all expected to work in line with relevant health and safety regulations and STAR's health and Safety related policies that are available in the Health & Safety section on our intranet.

This means:

We are committed to health and safety. This is set out in our ***Health and Safety Policy***. This is available on our intranet. Note that the Policy sets out in detail the expectations of STAR and all staff in respect of health and safety.

Note that there are additional responsibilities if you are a line manager or supervisor of staff or a Director of STAR. These additional responsibilities are fully set out in the ***Health and Safety Policy*** available on the intranet.

To ensure that we maintain a safe place to work, all accidents, incidents, occupational diseases, violence/aggression, dangerous occurrences and near misses must be reported. These should be reported to your Line Manager and recorded on 'Business World'. This ensures that we both fulfil our statutory requirements in reporting and that we can learn from what has happened so that we can improve our performance in this area.

You are responsible for ensuring that where a health, safety or other hazard is highlighted in a property or area that we are responsible for then it should be addressed in the course of your work or, if this is not possible, then you must report it.

If you believe that there is a health, safety or other hazard that has been identified and not addressed or that any health and safety guidelines are not being followed you must report it to your line manager. If you feel the matter is not being taken seriously then use the Whistleblowing hotline to report your concerns.

The Health, Safety and Welfare Group meet regularly to discuss health, safety and welfare issues. If you wish to raise any issues please email the Asset Manager or any member of the Health, Safety and Welfare Group. A list of members can be found under the Health & Safety section on our intranet.

Smoking at Work

All STAR work premises and sites are smoke free and smoking is not permitted, this includes e-cigarettes. You are not permitted to leave your workplace to smoke during contractual hours.

Lone Working

Many of our staff work on their own including in customer's own homes.

It is important that you take care to maintain safe working practices and follow the specific guidelines for Lone Working. Please see **Lone Working Policy** on the Intranet for more details.

This means for example:

Q. One of the tenants swore at me on the phone and threatened me. I know that they were just blowing off steam. Do I need to report it? It seems a bit over the top?

A. Yes. It is not acceptable for staff to be sworn at and threatened. If you fill out the **Accident, Incident and Near Miss Form** on Business World they will take appropriate action.

Alcohol and Substance Misuse

We all have a general duty to be fit to undertake their role at all times; this includes reporting for work free from the effects of drugs and alcohol.

You are prohibited from consuming alcohol either during work or outside working hours to an unreasonable level that may impair performance at work, impair working relationships, create a potential risk to health and safety or adversely affect the public image of the Service.

You may not continuously store alcohol at work for personal consumption in personal areas such as lockers, desks or drawers.

Drugs are not allowed to be used whilst at work unless either prescribed by a medical practitioner or they are available legally without prescription and are being used as directed by the manufacturer.

We expressly prohibit the use, sharing, and dealing of any illegal drugs or any use of prescription drugs (not prescribed by a doctor) whilst on duty. You must not report, or endeavour to report, for work having consumed drugs that are likely to make you unsafe for work.

Additional standards are required for staff who work in safety critical roles e.g. driving, operating machinery or working at heights.

For further advice, please refer to the **[Driver Policy](#)** and the **[Working at Heights Policy](#)**, which can be found on our intranet.

If you are taking legally prescribed medication or any over the counter medicines, you should seek advice from your GP and should inform your line manager if there are likely to be any side effects which could have an effect on your ability to work safely.

We will raise awareness of the effects of drugs and alcohol and encourage staff with a drug or alcohol problem to voluntarily seek help.

For more information, see our **[Workplace Substance Misuse Policy](#)** on the intranet.

By this we mean:

Where we have reasonable suspicion that a member of staff is impaired in their work because they have been drinking alcohol then we, a supervisor or other manager, can request the member of staff to take a **breathalyser test**.

This means for example:

Q. My line manager appears to drink regularly in work time. I sometimes smell alcohol on her breath. She doesn't appear to be drunk but I think there is a problem. What should I do?

A. There is a requirement for you to encourage colleagues to seek help if they have a problem. You should avoid covering up for colleagues and should pass on any suspicions you have to your line manager. If it is your line manager who is the subject of suspicion employees should speak to the next level of line management.

Gambling

You may not gamble or participate in any games of chance on company premises, on company electronic devices or while conducting company business. The only exceptions are Charity raffles or lottery syndicates that are authorised by a senior manager.

Workplace Harassment and Bullying

We aim to provide a working environment that respects the rights of each individual employee and where colleagues treat each other with the utmost respect. We have a policy of **zero tolerance** towards any behaviour that is unacceptable from our employees (including volunteers), from service users and from elected members.

We expect everyone to treat others with dignity and respect, whoever they are and whatever their personal characteristics.

All allegations of harassment and bullying will be treated seriously and with sensitivity for both the victim and the alleged perpetrator. They will be investigated promptly and a speedy resolution sought. This may include disciplinary action.

If you want to make a complaint, we will make sure that only those who need to know will be advised. You can report this to your line manager, trade union representative, or a Support Officer, in confidence, to receive support and guidance.

For more information, see our ***Bullying and Harassment Policy*** on the intranet.

Domestic Abuse

We are committed to caring for staff by ensuring a safe, healthy and productive working environment. This includes taking action to assist staff during difficult times and providing advice to employees and managers to help eliminate or assist with domestic abuse issues affecting employees.

If you are experiencing any issues of Domestic Abuse you can speak to your line manager or to one of the Support Officers.

For more information, please see our ***Workplace Domestic Abuse Policy*** on our intranet.

By this we mean:

Harassment is unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual".

Bullying may be characterised as offensive, intimidating, malicious or insulting behavior, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient".

We respect each other's privacy

We take your privacy rights seriously. We respect the privacy and dignity of our fellow employees and safeguard the confidentiality of employee records. We collect and retain personal information needed to support functions such as pay and other benefits. We will respect employee personal information and use it only for legitimate purposes in accordance with legislation and statutory guidelines.

Note that this commitment to protecting employee privacy extends beyond the period of employment and includes information about former employees.

Email and other messages are normally considered private between sender and recipient. However, if there are reasonable grounds to suspect that electronic services are being used inappropriately, we reserve the right to monitor the content of messages sent or received using our facilities, even where marked 'personal'. Such monitoring is intended to ensure compliance with our policies and that the Company and its users are acting lawfully.

The use of electronic services for personal use outside of the workplace is considered a private matter for the individual; there are occasions when we reserve the right to take a legitimate interest in their usage.

We do not seek to dictate how employees conduct themselves in their personal lives outside of work. However, unlawful, anti-social or other conduct by employees that may jeopardise the company's reputation or position will be dealt with through the disciplinary procedure. When an employee makes comments public on any social media site (including Facebook, Twitter, Instagram, WhatsApp, LinkedIn, Tik Tok etc.), or emails then they abandon any rights to have their comments treated as private and therefore abandon any right to freedom of expression and to have their comments treated as private under the European Convention on Human Rights. The Company's interference with the right to respect for private and family life, and the right to freedom of expression can in some circumstances be justified (for example in protecting reputation or confidential information).

This means for example:

Q. I want to see my personal file. How do I do this?

A. You are entitled to see anything written about you. To make a request please ask your line manager who will be able to make arrangements for this information to be sent to you within one calendar month of your request.

Q. I am a manager and I need to see one of my team's email while I am on leave. Can I do this?

A. This can only be done if the staff member has given their written consent, or their email needs to be accessed by their line manager for specific work purposes whilst they are absent or access is required as part of a formal internal investigation. The Data Protection Policy outlines the process.

The Company will treat 'electronic behaviour' in the same way that it would treat 'non-electronic behaviour' and any breaches of the organisations policies and procedures detected will be dealt with as a disciplinary matter. For further information, please refer to the *Social Media* and *Disciplinary* policies.

We will comply with any legitimate requests from authorised bodies for information under appropriate legislation.

For more information, see our *Data Protection Policy* on our intranet.

You will undertake regular relevant training to ensure that you understand your role in safeguarding and using and protecting information.

We safeguard our and others property and information

Safeguarding our assets is the responsibility of us all. Our ability to give a good service to our customers requires the efficient and proper use of our assets and resources.

You are expected to use and maintain such assets with care and respect whilst guarding against wasting assets or abusing them. Assets do not just include physical property, equipment, supplies of tools and materials or Company vehicles but less tangible assets such as company or customer information.

You are expected to protect from disclosure or misuse all non-public information about the Company. However, information must be disclosed as required to comply with relevant legislative requirements. This information must not be used for your own personal advantage or passed to anyone who is not entitled to receive it. This information should not be posted on any public forum or social media sites such as Facebook, Linked-In, Twitter, WhatsApp or Instagram.

All data, documents and information produced or used in your work is the property of the company and not owned by you personally. All information held on Company equipment may be examined to ensure compliance with all its statutory and internal policy requirements.

You may have access to confidential information in the course of your employment with STAR which if divulged would be valuable to competitors or potential competitors. It is an important duty of all employees as part of their contracts of employment, not to divulge such information, or use information in any way prejudicial to the interests of their employer. This will include terms of contracts, financial information, business methods and practices and intellectual property.

We may also inspect, monitor or record the use of all other company assets including tools, materials and company vehicles at any time.

You are expected to comply with all safety precautions and measures of STAR that are intended to maintain the confidentiality of information and to limit distribution to instances of a legitimate need to know basis.

This means:

Your obligation to safeguard information will continue if your employment with us ends. Without specific written authorisation from us you may never disclose or use non-public company information.

This means:

As we are a Council owned company we have an obligation to comply with the requirements of the Freedom of Information Act 2000, other legislation and guidance relating to access to, and the provision of, information on the Company and its operations. If information is requested under the FOI Act it must be provided within 20 days. For more information, see the *Freedom of Information Policy* on our intranet.

This means for example:

Q. Can I use my computer for personal use e.g. browsing the internet?

A. We do allow occasional use of electronic services in a user's non-work time such as before or after your working day. There are guidance notes about the use of electronic equipment for personal use in the *Acceptable Use Standards*.

Company assets may not be used, with the exception of electronic services for personal use, without the express permission of a senior manager. This includes personal use of company funds or cards.

Whilst the use of electronic services for personal use outside of the workplace is considered a private matter, there are occasions when we reserve the right to take a legitimate interest in their usage.

For more information about our policy on information and on the acceptable use of electronic equipment see our [*Data Protection Policy*](#) and [*Acceptable Use of Standards*](#) on the intranet.

We respect others information and property

You will observe our obligations of confidentiality in regard to personal and other information such as information about people or other companies we may gather in the course of our work. You will look after this information to the same standard as we would expect to be in place for our own information.

In our work we may be responsible for the property of others in order to fulfil work requirements. You will take reasonable care in the use of such property in the course of your work.

We maintain accurate records and report results

You are expected to be honest in all dealings with STAR. You must create accurate records that reflect the true nature of transactions and activities that they record. In normal circumstances any concerns should be reported to your line manager but if it is not taken seriously you are expected to contact the 'Whistleblowing' hotline.

If you are uncertain as to what records you should be making or how they should be made, stored or monitored discuss this with your line manager.

If you suspect or learn that records are misleading or contain errors, you must promptly inform your line manager.

You must not falsify or improperly alter any records. You must never direct someone else to prepare or approve a false or misleading record and will be no defence to say that that someone else directed you to make a record that you knew, or had reason to suspect, was false or misleading. You must not intentionally take any action that leads to the creation of false or misleading records, such as withholding information from, or providing incomplete information to, someone who is preparing a record. If you feel this has occurred, please contact your line manager.

Overpayments of salaries and expenses

You should report any overpayments that you have received in your salary and/or expense payments to your line manager or the Payroll team in line with payroll procedures. You are required to repay any overpayment made to you in full. Repayments may be agreed over a negotiated time period depending on circumstances. This includes any payments which are made when you have left the organisation.

Retaining company records

Our records must be maintained in accordance with relevant legislation. You must never destroy, mutilate or conceal any record if you have been directed to retain it, or if you know, or have a reasonable expectation – of any litigation or any internal or external investigation concerning that record. If you feel this has occurred, please contact your line manager.

This means:

Accurate records should include (but not exclusively):

- Reports of time worked.
- Attendance and absence records.
- Expenses claims.
- Productivity information.
- Financial information.
- Records relating to procurement processes.
- Quality assurance checks of work and property.
- Records of work that could be needed in later legal proceedings or other investigations.

You can find further guidance in the ***Records and Documents Retention Policy*** on our intranet.

We obey all laws and statutory regulations

Our reputation is extremely important. Part of our reputation relies on our commitment to ensuring that we follow all law and statutory regulation in the way that we carry out our business. We will co-operate with all applicable regulatory authorities and regulatory codes. We also frequently adopt industry standards or codes relating to our business.

Where legislation, statutory regulation or industry standards or codes relate directly to your work you should be familiar with the aspects of the law, regulation or standard and comply with them where they apply.

If you are worried as to whether we or any organisation who does work on our behalf are complying with the law, statutory regulations or any industry standards that we have adopted then you must raise your concerns with a line manager or senior manager. If you feel the matter is not being taken seriously then use the Whistleblowing hotline to report your concerns.

We comply with processes for the letting of tenancies, awarding of grants or contracts

We are responsible for the allocation of significant resources, not least the allocation of scarce affordable housing. Our responsibility is to allocate those resources wisely and fairly. Policies and procedures are in place to ensure that we can demonstrate that we are allocating resources fairly.

You must ensure that you comply with all policies, procedures and guidance in the allocation of resources. For further guidance see the **Financial Rules**, the **Contract Procedure Rules** and the **Lettings Policy**.

If you suspect that there are unfair or no processes in place for allocating any resource, then you must raise your concerns with your line manager or senior manager. If you feel the matter is not being taken seriously then use the Whistleblowing hotline to report your concerns.

You are expected to be familiar with the policies in place to deal with fraud, bribery and money laundering. These are designed to protect company assets and to enable employees to report concerns without fear of reprisal. The **Anti-Fraud**, **Anti-Bribery** and **Money Laundering policies** can be found on the intranet.

This means:

The requirement does not only relate to our own staff but also to any company or organisation that does work on our behalf.

This means for example:

Q. I noticed that one of the contractors on site seems to be using ladders without regard to their own safety.

A. You must report this to your line manager or a senior manager. If you feel the matter is not being taken seriously then use the 'Whistleblowing hotline to report your concerns.

Q. I notice that one of my colleagues seems to take a very judgemental attitude to applicants for housing. I think she may be bypassing applicants she doesn't like.

A. You must report this to your line manager or a senior manager. If you feel the matter is not being taken seriously then use the Whistleblowing hotline to report your concerns

We will build effective relationships with our colleagues, customers and other stakeholders

In order to be effective we will build positive relationships with our colleagues, customers and with the community. We will do this by following our four golden rules for achieving STAR success.

You are expected to follow our golden rules of:

Caring and Respect

Be Positive

Learning and Development

These are discussed in more detail in the section on 'We will create a Positive Working Environment.'

Our other golden rule is:

Keeping our Promises. You are expected to be realistic and honest about what we can achieve. You will make sure that you do what you say you will do. You will take personal responsibility for making sure you deliver what you and STAR has promised and tell our customers what you and STAR have done. If something does go wrong you will be honest about mistakes, say sorry and play your part in putting it right.

To do this we all need to:

- **Communicate openly and honestly**

We will hold ourselves and others to account. We will consult and listen to residents before we address issues and explain how we reach our conclusions. You will ensure that all our communications are factual and do not give a misleading impression in the information you provide.

- **Treat people with respect**

Sometimes we have to tell people information that they may not be happy to hear. We also have to deal with people who have a range of issues. You will be expected to treat everyone with respect no matter what their background or previous relationship with us and follow our Golden rules.

This means for example:

Q. One of the tradesman promised them that they could have a new bathroom just because they were being very insistent and they wanted to end the conversation. I know that they are not due to be inspected for another 2 years. What should I do?

A. You must report this to your line manager or a senior manager.

Q. I heard my colleague on the phone with a difficult customer. I only heard one end of the conversation but they seemed to be belittling the customer. I don't want to tackle my colleague myself. What should I do?

A. You must report this to your line manager or a senior manager

Providing references

Official references provided on behalf of STAR for any employee, past or present should only be issued by a Senior Manager or HR or such other persons to whom the responsibility is delegated.

This does not prevent an employee giving a reference for any other employee, past or present, providing the reference makes it clear that the views are those of the author in a private capacity and not necessarily those of STAR. The use of official stationery, and in particular headed notepaper, for this purpose is not allowed.

Dealing with media enquiries

Sometimes we are approached to make comments about us and our work on behalf of the company by the media. If you are approached by the media, you should refer the enquiry to a member of the senior management team who will decide on the most appropriate person to deal with the response.

Developing appropriate relationships with Councillors and MPs

Mutual respect between councillors, MPs and us is essential to good local governance. This means responding promptly to their concerns whilst ensuring that STAR policies and procedures are adhered to. If you are not sure how to deal with an enquiry from a councillor or MP, employees should discuss this with your line manager.

If you need help

Resources for our staff

Supervisor or line manager

You should begin by consulting the person who best understands your area of work.

Human Resources

For employee related issues, you can get advice from Human Resources on 01743 210207/210208 or via email hr@starhousing.org.uk.

Legal Services

Shropshire Council Legal Services can provide guidance on issues relating to the law and statutory regulations. In the first instance raise with a member of the Senior Management Team who will consult with Legal Services.

Finance and Resources

For questions about Financial Issues, contact the Corporate Director or the Head of Finance on 01743 210222.

WHISTLEBLOWING

‘SPEAKING UP ABOUT WRONGDOING’

Contact a Senior Officer at Shropshire Towns and Rural Housing. Specific contact details for officers can be found on our web site <http://www.starhousing.org.uk>

Or

Ring Shropshire Council Whistleblowing hotline

01743 252627

or write to:

The Audit Service Manager, Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, Shropshire, SY2 6ND.

Who are the Senior Officers:

- Managing Director
- Corporate Director
- Operations Director
- Assistant Director Assets
- Assistant Director Housing

BULLYING AND HARASSMENT

Harassment and Bullying Support Officers

We have officers who support staff confidentially if they feel that they are being bullied or harassed. For details of our Support Officers see our ***Bullying and Harassment Policy*** on the intranet.