

the **calico** group

Living Our Values



Index

	Page
Message from the Chief Executive	3
Do's and Don'ts	4
Introduction	6
Failure to Follow Code of Conduct	6
Professional Boundaries	6
Standards of Behaviour	6
General Standards	7
Financial Conduct	7
Customer Service	7
Confidentiality	8
Dealing with Press & Media	8
Equal Opportunities	9
Alcohol, Illegal Drugs and Substance Abuse	9
Health and Safety	9
No Smoking Policy	9
Harassment	10
Employment Matters	10
Company Property and Assets	10
Computer Systems and Software	10
Social Networking Sites	11
Tendering and Purchasing	11
Dress Code	12
Gifts and Hospitality	13
Outside Activities	14
Conflicts of Interest	16
Whistle blowing	17
Right of Appeal	17
Breaches of the Code of Conduct	17

APPENDIX 1 Professional and Personal Boundaries (Including Guidance)

APPENDIX 2 Declaration of Interest

APPENDIX 3 Gifts and Hospitality Form

Dear Colleague

The reputation of the Company as an open, fair and professional organisation with a high standard of integrity and commitment to customer service is dependent upon the conduct and behaviour of its staff.

We do not pay lip service to ethics; it is part of who we are and what we represent.

This document sets out the standards of behaviour expected from employees of this company. The standards provide guidance on how to deal with conflicts of interests, how to act within the law, and how to adhere to our company values. They also challenge us to consider other facets of our behaviour – our relations with one another, our customers and with the communities in which we work.

I believe that a successful company is one that acts with integrity and earns the trust and respect of its customers, partners and employees. Please ensure that you understand this document, embrace it and work by the principles that stand at the heart of our company culture.



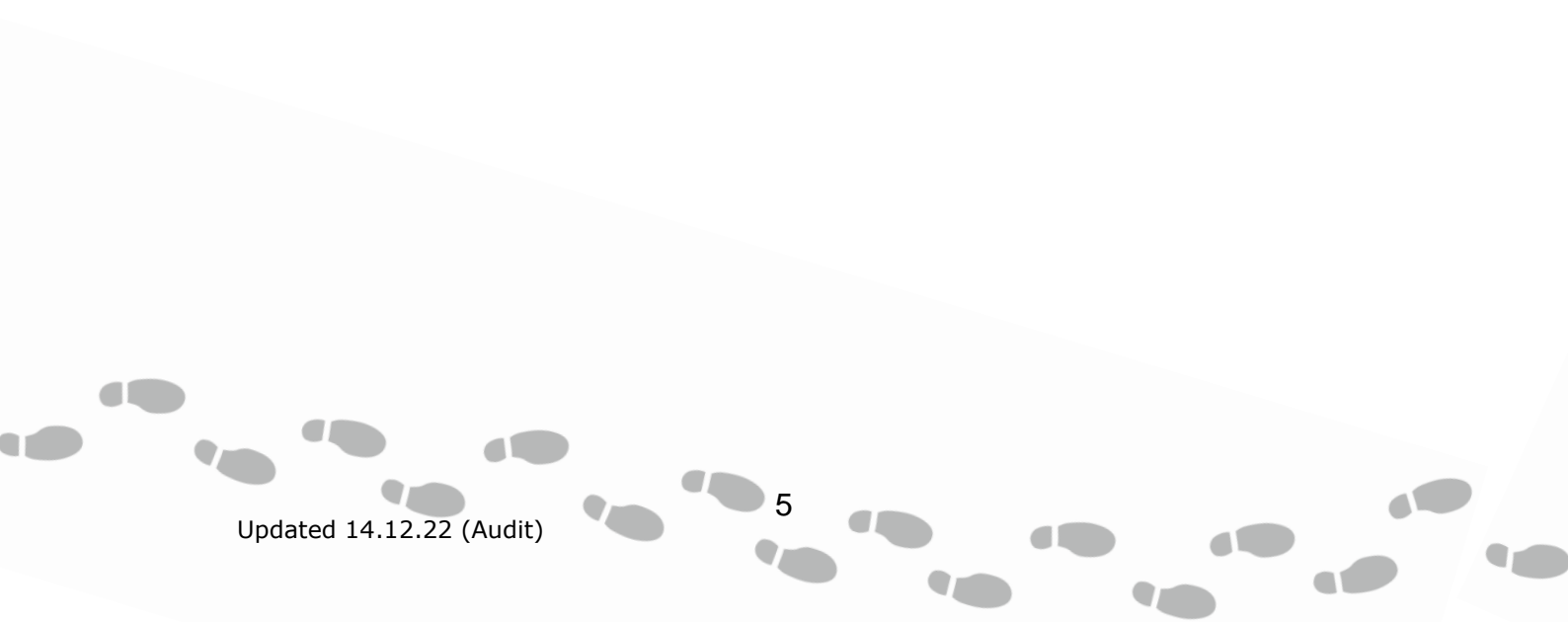
Anthony Duerden
Chief Executive

Do's and Don'ts

The following is a brief summary of the Company's code of conduct, "How we Work" and should be used as a reminder of the code itself. It is your responsibility to read and understand the full code of conduct.

Do

- Give the highest possible standard of service when dealing with the company's customers ensuring courteous, efficient, impartial and equitable service delivery to all groups and individuals.
- Respect confidentiality. Check with your manager if you are in any doubt about what information you can/cannot give out.
- Comply with the Company's Equality and Diversity Single Equality Scheme. If you are unsure about how it affects you, ask your manager.
- Show consideration and respect towards work colleagues, and avoid actions that may cause offence.
- Ensure that during the course of your work that you are always aware of health and safety implications. Bring any concerns to your manager immediately
- Ensure that you attend work dressed in a clean and tidy manner, appropriate to your duties. If you are provided with a uniform, please ensure you wear it.
- Declare to your manager any personal relationships that occur with a customer or client of Calico. Specifically for Acorn this also includes any personal relationships with colleagues. Potential risks should also be considered when forming relationships outside of work that could compromise your role, for example with ex-clients, current non Acorn service users, fellowships.
- Declare to your manager any gifts or hospitality you receive in the course of your duties.
- Declare to your manager if you (or a close friend/relative) have a personal, social or business relationship with contractors/suppliers working for the Company, as this may be seen as a conflict of interest.
- Declare to your manager if you (or a close friend/relative) are likely to benefit either financially or non-financially during the course of Company business/transactions.
- Ensure you get written consent before undertaking outside paid employment if your post is grade 8 or above.



Don't

- Ignore poor service – take responsibility for doing something about it
- Release personal information if unauthorised to do so
- Use Company transport, tools and equipment and other articles provided by the Company for private use or employment outside the Company.
- Undertake outside work, which reflects detrimentally on the image of the Company.
- Carry out additional work in your own time that involves Company properties (including providing private work for tenants of the Company) or contractors commissioned by the Company.
- Undertake paid outside employment with your line manager or supervisor. (This is to ensure that managers who supervise staff, do not feel compromised, and there is no opportunity for problems/detriment [with working relationships] to develop).
- Get involved in recruitment or other employment matters if you have a close personal relationship with a candidate involved in the process.
- Put yourself in a position where your actions could be perceived as conflicting with your duty to the Company.

Introduction

This code of conduct sets out the standards of behaviour expected from all employees.

The code of conduct forms part of all employees' contract of employment and it is important to the employment relationship that employees abide by the principles at all times.

Managers are responsible for ensuring that staff reporting to them are aware of the principles of this code.

Failure to follow Code of Conduct

Failure to follow this Code of Conduct may cause detriment to the Company and its work and so will be viewed as a disciplinary matter, to be dealt with under normal disciplinary procedures. Any forms of discrimination or harassment may be treated as gross misconduct and will be dealt with in accordance with the disciplinary procedures.

Professional Boundaries

Staff working within Calico have a responsibility to deliver services, communicate and interact with customers and colleagues in a professional manner which promotes and enhances respectful behaviour, sustains our reputation and engenders positive reactions from our customers, service users and colleagues.

Staff should ensure that work relationships are primarily professional first and foremost. Any friendship/personal issues that develop will stay out of the work place and not create problems at work.

Full details of how to deal with customers, clients and service users are found in The Professional Boundaries Guidelines: Appendix 1.

Standards of Behaviour

For services providing personal care, this code of conduct complies with the GSCC (General Social Care Council) code of conduct.

The National Housing Federation have highlighted Standards of Behaviour that should be observed in all Housing Associations. The necessary standards are documented fully in the National Housing Federations "Excellence in Standards of Conduct Code for Members". The most relevant behaviours are outlined below:-

- **Selflessness** - take decisions solely in terms of the values of the Company. You should not do so in order to gain financial or other material benefits for yourself, your family, or friends.
- **Respect** – be courteous and professional in all dealings with colleagues, clients, residents and stakeholders.

- **Impartiality** – ensure efficiency and impartiality in the delivery of any services to clients and residents. Avoid any personal relationships that may give rise to conflicts of interests or the appearance of any such conflict.
- **Equality and Diversity** – avoid any discriminatory actions and promote Calico’s policy on equality and diversity at all times.
- **Integrity** - do not place yourself under any financial or other obligation to outside individuals or organisations that might influence you in the performance of your duties.
- **Objectivity** - ensure that in the delivery of services, the appointment of staff or the awarding of contracts, you ensure impartiality and that choices are made on merit alone.
- **Accountability** – employees are accountable for their decisions and actions to the customers and must submit themselves to whatever scrutiny is appropriate.
- **Openness** - be as open as possible about all the decisions and actions that you take. You should give reasons for your decisions and restrict information only when individual or commercial confidentiality clearly so demand.
- **Honesty** - declare any private interests relating to your duties, and take steps to resolve any conflicts arising in a way that is lawful, and protects the reputation, and values of the Company.
- **Leadership** - promote and support these principles by leadership and example.

It is expected that staff observe these behaviours at all times.

General Standards

Staff are expected to carry out their duties in accordance with the Company’s policies and procedures, and to follow reasonable management instructions. High standards of personal conduct at work are expected. Staff should always demonstrate courtesy, efficiency, reliability, sobriety and punctuality.

Financial Conduct

Staff must ensure that any funds and resources entrusted to them are used responsibly and lawfully. The Company’s financial standing orders and other regulations and internal controls should be observed at all times. It is both a criminal and disciplinary offence to corruptly receive a gift, loan, fee or reward or other advantage in return for showing favour (or disfavour) to any person or organisation.

It is the Company’s policy to report all cases of fraud to the police.

Customer Service

All employees are expected to treat tenants and other customers with courtesy and respect at all times.

An employees general actions, behaviour and demeanour while at work should be such as to present the Company as a professional and effective organisation. Staff should avoid doing things which might imply a sloppy or uncaring attitude.

Staff with direct customer contact should comply with the Professional Boundaries Guidelines; Appendix 1. The Company's Customer Care Policy should also be observed at all times.

Confidentiality

The Company values make a commitment to ensure the open conduct of our business. However, there will be times when high levels of confidentiality should be maintained.

- Staff should abide by the Company's Data Protection procedures designed to protect the confidentiality of information held about other colleagues, tenants or customers.
- Confidential business information should not be disclosed to external parties unless it is appropriate to do so. This would include matters relating to the Company's finances, future development programmes, discussions with potential partners and contract proposals. Some information in these areas is already in the public domain but staff who have doubts should seek clarification from their Director before disclosing any information which might be commercially sensitive.
- Staff should not use any information obtained in the course of their employment for personal gain or benefit, nor should it be passed on to others who might use it in such a manner.

Dealing with the Press and Media

- Staff must not without permission, from the Marketing and Communications Manager, a relevant senior manager or Director, pass or distribute to the press or media any information or materials relating to the Company.
- Similarly staff must not write letters to the press or write media articles about the Company and its activities, or write letters or articles in the capacity as a Company employee without prior permission/approval by the Marketing and Communications Manager or a Director.

- Staff must not make comments or statements to the press. If approached by the media, staff should take details about the enquiry and pass it on to the Marketing and Communications Manager.

Equal Opportunities

Equality of opportunity is a core value for the Company. Every member of staff is required to comply with the spirit and letter of the Company's Equality and Diversity Single Equality Scheme and related procedures at all times.

Alcohol, Illegal drugs and Substance Abuse

Alcohol, drugs or substance abuse impairs judgement and you can put yourself, your colleagues, customers and clients at risk if you undertake your duties whilst under the influence of drink, drugs and dangerous substances. Abuse of any such substance whilst you are at work, or affecting your work will be treated as a serious disciplinary offence. Alcohol, drug or substance abuse should not affect the way you deliver your duties/responsibilities; the smell of alcohol on employees will not be tolerated. The Company has an Alcohol and Drug Policy which should be referred to before any action is taken.

Health and Safety

Staff should abide by the Company's Health and Safety procedures at all times.

It is the responsibility of all members of staff to ensure that their conduct does not endanger the health and safety of themselves or other employees, visitors, tenants and customers of the Company. The company also has a "Keeping Safe" procedure which is designed to provide guidance to staff on how to protect themselves from the risks they may encounter during the course of their work. Staff are also expected to comply with the guidance contained in this policy.

Staff should bring to the attention of their line manager any circumstances which might have health and safety implications.

No Smoking Policy

A ban on smoking in public and enclosed places was introduced in England and Wales in 2007. This law applies to virtually all 'enclosed' and 'substantially enclosed' public places and workplaces. The law also requires vehicles to be smoke free at all times if they are used:

- to transport members of the public or
- in the course of paid or voluntary work by more than one person - regardless of whether they are in the vehicle at the same time.
-

This means that it is against the law to smoke in any of Calico's properties or vehicles. Any person found smoking in any of Calico's properties or vehicles will be disciplined.

Smoking will not be permitted immediately outside the entrance to any of Company premises.

Smoking will not be permitted in customers/clients/tenants houses.

Harassment

Any form of personal harassment at work is opposed. The Company has a Dignity at Work procedure, which all staff should comply with. Harassment is considered a serious breach of conduct, which may be regarded as gross misconduct.

Employment Matters

Staff involved in making appointments should ensure that these are made on the basis of merit alone. Personal preferences should not influence judgements made.

Staff must not be involved in any appointment where they are related to, or have a close personal relationship, with an applicant. Any such relationship should be declared to their manager.

In the same way, staff should not be involved in any decisions regarding the discipline or promotion or pay of any employee who is a relative, partner or close friend.

Canvassing the support of colleagues or board members for any candidates applying for employment is not permitted. Any attempt by others to do so should be resisted and reported.

Company Property and Assets

Staff must not use Company transport, tools and equipment and other articles provided by the Company for private use or employments outside the Company.

Employees are expected to take reasonable measures to protect the Company's property and assets from theft, damage or misuse.

Computer Systems and Software

Employees should not do anything which would risk the integrity of the Company's Information Technology systems. This would include the use of unauthorised or unlicensed software on the Company's system.

All software and disks incorporated onto the Company's system must be virus checked and approved by the IT section.

Staff must not copy software products licensed to the Company.

The Internet and external email usage policy should be read by all staff using these facilities. Staff should ensure that they are familiar with the guidelines.

Social Networking

Social Networking sites such as Facebook, Twitter, Instagram and Bebo are popular.

The accessing of any social networking site for personal use is strictly prohibited during works time. Staff are not able to access such sites from work computers or laptops, or via the Citrix network, unless special permission has been granted for business purposes.

Professional networking sites (e.g. LinkedIn) may be accessed during works time for legitimate purposes related to the job role e.g. sharing best practice.

As an employee of Calico, staff should abide by the guidelines set out in our Social Media Policy whenever they use social/professional networking sites, (i.e. whether using in own or works time) in order to protect themselves and the Company.

Most individuals view their personal Social Media pages as private. However, employees should be aware that any of the information or communications posted on their Social Networking Site can potentially be accessed by:

- clients/service users
- current or potential employers;
- recruitment agencies;
- co-workers;
- the employer's competitors;
- government and law enforcement agencies;
- others outside the employee's trusted network.

The underlying point of social networking is to share information. However the risk is that leaving privacy settings open means that the user cannot control who sees their information or how they use it. It is advised that privacy settings are limited to who you intend to see your profile. Customers, clients and third parties may utilise your information to benefit their own means. Staff need to be vigilant regarding the above and give some thought to the implications of working with vulnerable service users and also the Company's reputation when creating profiles on social networking sites.

For more information, please refer to Calico's Social Media Policy.

Tendering and Purchasing

Staff involved in buying goods or services on behalf of the Company should ensure that:

- Decisions provide the best value for money
- Decisions are taken objectively and based on merit and without favour to one supplier or contractor
- Competition between contractors/suppliers is fair and open
- Appropriate procedures are followed, e.g., using the approved suppliers' list or following tendering procedures.
- No special favour is shown to any business which a member of staff or their family have some personal or professional connection.
- Employees dealing directly with contracts, suppliers, and consultants should avoid using them for private purposes.
- Where it is not practicable to use other contractors, staff should make a declaration to their line manager (see Declaration of Interest Section and form at Appendix 2) and obtain written consent before such use.

Dress Code

The Company has established a dress code for the guidance of staff on office and work attire. The code is intended to demonstrate:

- Respect for our customers and business partners
- Define our Company image as a professional and modern organisation working in the social and commercial sector
- Ensure that staff can wear appropriate and comfortable clothing that does not conflict with cultural and religious traditions.

Whilst at work your dress and general appearance should be clean, tidy and consistent with the professional image the Company seeks to project.

Front-line staff, more than any other, portray to our customers the corporate image of the Company. To ensure consistency and a professional image staff have been provided with uniforms in the following areas:

- Customer Services
- Caretakers
- HomeWorks Tradesmen

It is important that staff provided with these uniforms ensure that they wear the full uniform at all times, including hats and safety wear where appropriate.

Staff who work either in an office environment or with our customers are expected to wear smart casual dress.

Staff who are involved in meetings or who might reasonably expect to be called to meetings with partners, business associates/professional contacts eg. Local authorities, health authorities, funders etc. should adopt business dress, normally a suit or jacket with trousers/skirt.

The following items are not considered appropriate attire for the workplace.

- Trainers
- Shorts
- Jeans
- T-Shirts with Logos

The Company does not wish to be over-prescriptive and remove individuality but does expect staff to be respectful of the code and mature in its interpretation.

Managers are expected to guide staff where dress is inappropriate, and seek advice from Human Resources should staff be unable to comply with the above, for example; where religious or cultural traditions conflict with the above code.

Gifts and Hospitality

The definition of Gifts and hospitality include but is not limited to:

- The free gift of any goods or services worth over £25.
- The opportunity to acquire any goods or services at a discount or at terms not available to the general public.
- The opportunity to obtain goods or services not available to the general public.
- The offer of food, drink, accommodation or entertainment, or the opportunity to attend any cultural or sporting event.

Staff should not place themselves under an obligation that might influence, or be perceived to influence the conduct of their duties. This means that the receipt of hospitality and gifts must be subject to clear restrictions, and that any that are accepted must be declared and recorded.

Gifts

Staff must not accept cash, or personal gifts over £25, under any circumstances. Items of nominal value, such as free promotional pens, calendars and similar items may be accepted, without the need to declare them.

When a gift has to be refused, staff should be courteous, but firm and draw the attention of the person making the offer to this code. Any gifts or hospitality offered to staff at a value of over £25 should be raffled to staff or donated to a charitable cause as a gesture. The gift and proceeds from the raffle should be declared using the gifts and hospitality form shown at Appendix 3.

Gifts that are offered corporately may be accepted, but must be declared using the gifts and hospitality form shown at Appendix 3. The Chief Executive/appropriate Director will decide on appropriate distribution.

Additional guidelines shown at Appendix 3, set out the unique position for support workers, with regard to the acceptance of gifts from residents and clients.

Hospitality

Lavish hospitality should never be accepted, along with hospitality which the Company would not reciprocate in similar circumstances. Modest working meals and light refreshments may be accepted without making a declaration, other hospitality deemed acceptable includes:

- Where there is a genuine need to impart or share information, or represent the Company
- Where the Company should be seen to be represented
- The hospitality concerns attendance at a relevant event, conference, or course where it is clear the hospitality is corporate rather than personal.

The above hospitality accepted must be declared using the Gifts and Hospitality form shown at Appendix 3.

Reporting

Declarations of gifts and hospitality made using the Gifts and Hospitality form shown at Appendix 3 should be submitted to the Group Head of Governance. The Governance Team will maintain a Gifts & Hospitality Register. Additions to the Register will be reported to the Executive Director of Group Finance each quarter and the Group Audit & Assurance Committee each year, together with reporting any action taken.

Outside Activities

The Company has no desire to place restrictions on, or interfere with an employee's private life. However, there may be circumstances when an employee's external interests affect their employment with the Company. Staff should not utilise any information accessed through work, or through contact with contractors or suppliers for their own means. Staff should not actively contact customers outside of working hours for non-business related matters.

Outside Work

Generally employees of all grades should not undertake outside work if it overlaps in some way with their official duties, or causes conflict of interest, or makes use of workplace materials:

- Disciplinary action will be taken against employees who undertake outside work, which reflects detrimentally on the image of the Company.

- Employees must not use Company transport, tools and equipment and other articles provided by the Company for private use or employments outside the Company.
- Employees who carry out additional work in their own time must ensure that no link exists with the Company, and the work:
 - Is wholly unconnected with the Company
 - That it does not involve Company properties (including providing private work for tenants of the Company)
 - Does not involve contractors commissioned by the Company
- Employees at a senior level currently at grade 8 and above must obtain written consent from the Head of Human Resources before taking outside paid employment
- Managers/Supervisors must not undertake paid outside employment with their staff. This is to ensure that line managers who supervise staff, do not feel compromised, and there is no opportunity for problems/detriment (with working relationships) to develop.
- Staff who do undertake outside work should not allow this additional work to interfere with the work of Calico. Priority should be given to the work of Calico. Staff should also ensure they sign the 48 hour opt out agreement, details can be found from the Human Resources Department.

Voluntary Work

Staff should obtain written permission before undertaking voluntary activities if those activities or organisations are in some way related to the activities of the Company (e.g. membership of a Board of another Housing Organisation). It is also the policy of the Company that staff should not be involved with any organisation, which might be in competition with the Company.

Conduct outside Work

There may be circumstances in which conduct of staff outside work, while not directly related to their employment, nevertheless, adversely affects the reputation and perceived integrity of the Company. For example; conviction, criminal offence or inappropriate conduct/relationship within fellowships. These circumstances may result in disciplinary action being taken.

Political Activity

Employees should avoid any political activity in the public arena, which could bring the Company into disrepute. Employees must not allow their own personal or political opinions to interfere with their work or impartiality.

Whilst employees are free to join political groups and work and campaign on their behalf, the political activity must not compromise the Company's neutrality. The Company has an Equality and Diversity Single Equality Scheme, and is committed to diversity. The principles and policies of the British National Party (BNP) conflict with the Company's commitment and policies on equality and diversity. For this reason, actively campaigning/supporting or becoming a member of the British National Party is considered unacceptable for employees of this Company.

Staff should discuss with their line manager any intentions to stand for political office, as detailed above there may be circumstances in which holding office on a Council/Board may conflict with the Company's interests.

Conflicts of Interest

The Company is in receipt of public money and therefore it is, necessary that the conduct of the Company and all its employees is beyond reproach. The Company will not make payments or provide benefits to employees, other than those, which are contained in the contract of employment. The company will also not grant a benefit to a close relative/friend of an employee without following the correct procedures. For example, if an employee's relative were to successfully tender for a roofing contract with the Company, the Declaration of Interest Form should be completed and fair and equitable tendering processes will be followed.

The company will not provide:

- Loans to employees
- Gifts to employees

Employees (or relatives/friends of employees) will not gain from the sale or purchase of Company property.

Employees (or relatives/friends of employees) will not unfairly gain due to the awarding of contracts by the Company to a person or firm.

Employees must ensure that their private or personal interests do not influence their decisions, and that they do not use their position to obtain personal gain of any sort, either for themselves directly, their families, or friends.

Employees should declare to their manager if they are a member of any organisation not open to the public, which has secrecy about its rules and membership or conduct. (See Appendix 2, for further details)

Employees have a responsibility to consider any connections, either financially or non- financially, which they or their family/close friends have with external organisations, contractors/suppliers and outside employment, which impact upon the work of the Company.

Employees must ensure that any financial or non-financial matters which could bring about conflict are declared in writing using the Declaration of Interest form, Appendix 2.

Declaration of Interest Form

All members of staff will be required to complete a Declaration of Interest form (appendix 2) – a reminder will be circulated on an annual basis and employees will be required to update their iTrent record in My Zone by confirming whether an interest applies and attaching the completed form where required.

Despite this employees should declare any conflicts of interest as and when they arise, and not wait until the annual check before disclosing the information.

Where an interest is declared by an employee, the form will be shared (by the HR team) with the Line Manager of the person making the declaration. A discussion regarding this will take place between the Line Manager and the employee and any risks identified will be considered and measures to manage/mitigate/remove risk will be put in place appropriately.

Senior Managers, Directors, Executive Directors and Board Members will be subject to a similar process but may be required to complete an alternative declaration form which requests further information, and this may be required more regularly. Persons who fall into these categories will be made aware of the process they are required to follow.

A central Register of Interest will be held by our GBS Governance team and shared with Board, Executives and Audit Committee appropriately as part of an agreed cycle.

Where declarations made may impact the decision making of Board or Executive members, the Head of HR will be made aware and will seek appropriate independent counsel.

Whistleblowing (Public Interest Disclosure Act 1999)

The above Act provides for employees to raise concerns about wrongdoing in the workplace. This includes:

- Potential Fraud
- Breaches of the Code of Conduct
- Actions which would question the integrity of the Company
- Misuse of Company assets

If employees have suspicions about dishonest or unethical behaviour they should first bring them to the attention of their line manager. The Company has a Whistleblowing procedure, which should be followed.

Right of Appeal

In instances where an employees request to engage in business activities, or where an interest in an outside organisation is found to be incompatible with their employment with the Company, employees will be required to comply with the decisions made by the Company. Employees may wish to appeal against the decision.

If employees wish to appeal they should do so in writing to the Head of Human Resources within 10 working days of receipt of that decision. A final decision will be made by the next level of Management.

Breaches of the Code of Conduct

Breaches of the Code of Conduct will be dealt with under the Company's Disciplinary Procedures and may lead to dismissal from the Company.

Appendix 1 - Code of Conduct
PROFESSIONAL AND PERSONAL BOUNDARIES

Introduction

We want staff to build a rapport with clients and provide friendly accessible services, at the same time you will need to establish and maintain appropriate boundaries between you and your clients.

You will be aware that the rights and needs of clients should be respected at all times and as such it is important to recognise that the interaction is not one of equal balance. Staff must therefore establish and maintain the boundaries. A professional approach is needed to ensure that this position of power is not abused and customers put at risk.

Interactions between clients and staff must be in terms of a professional relationship and have a clear framework within which to carry out all tasks and duties, to help protect individual employees and ensure that they do not place themselves in a difficult or potentially compromising position.

Because there is a potential for positions of power to be abused and professional boundaries to be broken, Calico must make it clear that the responsibility to maintain such boundaries rests with individual workers. Failure to meet this responsibility may lead to formal disciplinary action being taken against them. However, Calico also accepts that it has a responsibility to train and guide people on how to develop and maintain professional boundaries.

It is recognised that in many of the services that Calico delivers; for example housing and support services personality traits such as empathy can make the difference between a conversation and/or a decision being accepted in good faith or simply seen as an uncaring cold person who is not interested in the welfare of the client or the estate. These are the qualities that we recognised and valued when you were appointed to the role.

In certain situations empathy or humour can diffuse a difficult situation. Staff will have to use their judgement in deciding if the situation and time is right for that to happen and appreciate that sometimes they can get it wrong – and that they quickly need to correct the situation. We want our staff to have relationships that are positive and productive and will attempt to give our staff the skills to achieve this ambition by providing you with training and support. We also expect you to take responsibility for making sure that you act appropriately and in good faith.

It is very important that staff ensure that working relationships are not misread or confused with friendship or other personal relationships. This is essential in order to protect clients at a time when they may be vulnerable. It is also to protect staff from any risk of false allegations.

If a member of staff is in any doubt, they should seek advice from their co-ordinator, manager or HR department.

The standards that have been developed and which are set out below are designed to help you to manage your relationship with the client/customer in a friendly, professional manner. They should be read in conjunction with the SOAR technique which will help you to maintain flexibility and continue to provide friendly and accessible services.

Purpose

The purpose of professional boundaries standards are to:

- Clarify the relationships of staff providing direct and indirect services and support to clients and customers.
- Clarify the expectations of clients and customers
- Clarify the division between the professional and personal relationships between clients, customers and workers and therefore enabling consistent approaches to clients.

Requirements

Immediately a worker thinks there is a risk of a potential breakdown of his/her professional boundaries he/she must bring it to the attention of the line manager. Workers must alert their Manager or co-ordinator if they have personal knowledge of a client that falls under their case load and could create a situation of potential "client/customer conflict."

If any member of staff feels that a colleague is at risk of a potential breakdown of professional boundaries then they have a duty to protect both client and worker, and should bring the matter to the attention of the appropriate Manager. This is important because often the member of staff may not be aware that their behaviour has had any detrimental impact. It is better to feedback immediately and address the observation rather than allow it to perpetuate or to be repeated.

If a worker is aware, or becomes aware that she/he is related or is a close friend of a client this should be brought to the immediate attention of the Manager or co-ordinator.

If a personal relationship evolves between a client, customer, tenant or service user and a member of staff, due to either working at Calico or other reasons, there is a potential breakdown of professional boundaries. This should be highlighted to their manager who will treat this with confidence.

The manager may reduce or restrict contact with a customer, client or tenant if a potential risk is highlighted to them. The manager will ensure there is no potential issues of conflict and ensure the business is not affected by the situation where possible. The manager will provide protection for the employee to remove potential for any behaviour to be misconstrued and also minimise any impact for the Company

1. Definitions

1.1 Support Work relationship

A support working relationship is a professional relationship between the client and the worker in which the latter has a responsibility for ensuring that objectivity is achieved at all times.

1.2 Boundary

The boundary is the line in behaviour of where and how you are best placed to communicate and interact with customers. Beyond this line you could potentially create personal or unprofessional relationships which leave you open to accusations of inappropriate behaviour. Examples of these are detailed in Section 2, which identifies example unacceptable practices.

The boundaries should be constantly and consistently applied although it is recognised that personalities and circumstances may shape how the boundary is expressed and how the relationship is conducted. Staff are encouraged to reflect (individually and with their Manager) about how they interact with colleagues, customers and service users to ensure that they are aware of the boundaries they establish, how they create them and how they maintain them.

1.3 Customer/Client/Service User

A Customer/Client or Service User can be any of the following

- a) Someone who the worker is directly involved in providing services or support to.
- b) Someone who has previously had a direct service or support from a worker – such as a legal tenant of Calico or a recipient of our support service.
- c) Someone who is a current customer/service user/client who has no direct professional relationship with a worker.

1.4 Worker

This is anyone employed or contracted by Calico to provide direct and indirect services and support to customers, service users and clients.

2. Unacceptable Practices

Unacceptable Practices are those which put the professional/personal relationship at risk of crossing the support working relations 'boundary'. The following list is not exhaustive and if staff are in any doubt they should consult with their line manager if possible. Staff are advised that anyone accused of any of the following behaviour (or similar) will be subject to Disciplinary investigation in accordance with the Calico Terms & Conditions of Employment.

2.1 Sexual Contact or the inference of sexual advances

- Sexual acts
- Requests for/suggestion of sexual acts
- Physical contact which could be construed as sexually suggestive
- Sexual innuendo and/or insinuation of sexual acts/behaviour

Some examples of more subtle inappropriate behaviour may include the following:

- Inappropriate dress (as detailed in the Code of Conduct)
- Inappropriate use of body or verbal language i.e. language which is used to satisfy the need of the worker concerned and are not likely to have any benefits for the client.
- "invasion" of someone's personal space
- Asking the client inappropriate questions regarding their sexual habits.
- Relating aspects of third party behaviour which may create the impression that sexual contact is acceptable
- Contact by texting / use of social media that could be construed as sexually suggestive

2.2 Acceptance/Giving of Gifts and Hospitality

Staff must not accept/give gifts or hospitality from/to clients which may be interpreted as being given by the client/worker in return for preferential treatment/favours. Where it is difficult to refuse a gift, perhaps because it will cause offence, then staff should discuss this with their line manager.

Where small gifts are accepted which are in accordance with the gifts and hospitality guidelines these must be recorded.

Donations- In the first instance, Staff should discuss with their Manager the appropriateness of giving any donated gifts/furniture and, ideally, receive consent before arranging to receive them. Where this is not possible the action taken must be discussed as soon as possible after the event.

For more information please refer to section 21 of the Employee Code of Conduct.

2.3 Inappropriate personal disclosure

Staff must not divulge any personal information about themselves or other members of staff to customers/clients.

Personal Information includes the following:

- Personal address
- Intimate personal details
- Social activities
- Intimate family members details
- Previous personal history

This does not mean that you cannot have casual conversations about for example whether you have children or not, or that you go to the gym twice a week – it is about making sure you do not divulge information that means that you have put you/your relatives at risk, or where it is certain to lead to the client feeling that the relationship has gone beyond that of a

professional one. You must use your judgement to decide what is/is not appropriate.

2.4 Concealing Information from Colleagues about clients

Staff should not conceal any information from colleagues or official records about their clients or service users.

This may include:

- Personal information
- The intention of the client to self-harm or harm others
- Not reporting violent or critical incident/issues
- Child protection issues
- Not completing full records of client interactions

2.5 Misuse of Money/Property

Staff should not take, lend or use any money or property belonging to the client.

- Staff must not in any circumstance handle any clients monies (including cheques, bank cards, postal orders and bankers drafts) unless it is part of their job role
- Staff must not in any circumstance loan their personal property obviously this does not mean lending a pen.
- Transfer money or cash on behalf of their clients

If it is not acceptable to meet at a client's property, an alternative, appropriate venue must be agreed. It will not usually be appropriate to meet clients in working hours at venues such as Public Houses, and any other establishment deemed inappropriate due to confidentiality or health and safety issues. However, it may be that informal contact may be appropriate at certain times as discussed with your manager and as part of the working practices agreed within your team

It is of course understandable and accepted that you may come across into clients as part of your normal social activities, going shopping to the gym etc., and not as an agreement to a pre-arranged meeting.

2.6 Misuse of Client's facilities and Property:

Staff must not use client's facilities or property for their own use.

Examples of these are:

- Eating meals provided by clients
- Use of washing machines
- Cooking facilities

It is important for you to consider whether an offer from a client should be accepted – for example you would not want to refuse an offer of a cup of tea to offend someone. The key here is the intent and perception. There

must be no circumstance where a client makes an offer in order to secure services which he/she is not entitled to.

2.7 Discrimination/Harassment

No form of discrimination/harassment, either written or verbal will be tolerated by Calico. This can take the form of subjective comments which can be either written or verbal about a clients'

- Culture or race
- Gender
- Sexual orientation or preference
- Age
- Physical characteristics
- Disability
- Religion
- Belief
- Any other personal characteristics or any characteristics protected under the Equality Act 2010.

2.8 Treatment or any other forms of support

It is not acceptable for the worker to carry out treatment or give other support when:

- It is not part of the clients support plan
- The worker has not been given instruction to provide alternative support by their Line Manager
- The worker takes it upon themselves to help or contact the client on non-business related matters (this could be in working time or outside of business hours).

Some examples of this are as follows:

- Hair cuts
- Alternative therapies
- Religious counselling
- Removal of furniture
- Offering of products/services that are not related to Calico (e.g. Avon)
- Allowing the use of their personal address or the address of Calico to receive any correspondence on behalf of the client.

Notwithstanding these examples, if the client cannot be signposted to a relevant support agency and there is desire by the employee to assist in a voluntary capacity outside office hours the matter must be discussed with the line manager and clear parameters set before the voluntary work takes place. Where the matter is urgent please and a quick decision is required please use the **SOAR** test.

2.9 Abuse of power/Creating a Dependence

Staff have responsibility to discourage over reliance of the customer or client on one worker and to encourage and enable the client towards independence. Some examples of abuse and power and the potential for creating dependence are as follow:

- Inviting clients to the worker's home
- Socialising outside the support work relationship
- Encouraging the clients to rely on one worker
- Using the clients for the workers own emotional needs
- Recruiting clients to a place of worship

3 Key Responsibilities Of Staff and Managers

3.1 Supervision (1-1)

Managers must support staff and encourage them to raise/discuss matters directly and/or at 1-1 meeting. Staff have a responsibility to actively seek regular supervision (1-1), which is used constructively in the area of disclosing any feeling that they may be developing for the client. These disclosures will be kept confidential unless the situation remains unresolved and the relationship develops into a personal one, in which case the co-ordinator will be responsible for seeking further advice on this.

This is essential not just to ensure that the correct actions are taken but to record any situation that the member of staff has concerns about for future reference should any subsequent incident arise.

3.2 Training and Updating

Experienced workers have the responsibility to ensure that they have knowledge and understanding of the importance of keeping boundaries and the theories and concepts of transference and counter-transference and to ensure that new staff have an opportunity to understand these.

Managers are responsible for facilitating regular training and updating and in addition should discuss your training needs at regular annual intervals as part of the Annual Review process.

3.3 Client Information

All Calico staff have a duty to collect information about the customer, service user or client which is relevant to our management of their tenancy or to the delivery of services provided.

Some of the information may be in respect of household information and be personal to the customer/client and must be treated as such by the employee. All members of staff can and should maintain and update the customer database with relevant and up to date information to enable them and their colleagues (such as those in the Call Centre) to do their jobs correctly. This information must be held in accordance with the Data Protection Act.

Other information about customers and clients will be kept and used to help other members of staff to be aware of special circumstances or advisory information which will help them to do their job and in some situations help them be safe in the delivery of their duties.

It is important that we explain to customers, service users and clients why we are collecting information and to outline the nature of the relationship that we seek to establish. We should do this in a sensitive manner and where appropriate, form a contract of support with the client.

Managers must ensure that the clients have access to up to date information about services and service philosophies.

PROFESSIONAL AND PERSONAL BOUNDARIES GUIDANCE

Introduction

At Calico we encourage people to be flexible, go the extra mile and to use their initiative to assist customers. We deal with a range of vulnerable customers and staff constantly show how they are committed to making a difference to their lives. This approach has become part of our culture and employees are rewarded and recognised for their flexible approach and for going 'above and beyond' as part of the reward and recognition scheme.

Sometimes this flexible approach can be at odds with the employee code of conduct and maintaining a professional relationship. The 'Professional and Personal Boundaries(which forms part of the employee code of conduct and is set out below) has been put together to provide a best practice approach to assist employees and managers to understand how they should operate and behave.

Whilst it is important that the Professional and Personal Boundaries are read and understood by all employees there may still be circumstances where you are unclear. This may be either because the situation you are dealing with is unique and does not fall within the guidance, or because you have to make a quick decision on something to assist a customer which at the time seems right, or, where you are simply using your initiative to provide the best service you can.

The guidance below will assist you (with the help and support of your manager) to establish the best course of action to take should a situation arise where you are unsure how you should behave and where a potential conflict may arise.

How can I be flexible but still work within the boundaries

The aim of the standards is to protect both clients (who often can be vulnerable) and employees (workers) from putting themselves in a situation which could cause a conflict or their behaviour to be questioned. This can arise in a certain set of circumstances as detailed below:

- A personal relationship has started to develop between the client and employee
- The employee misuses their position of power and makes unwanted sexual and/or other demands on the client
- The employee accepts favours, use of equipment and facilities and/or gifts which are used to gain preferential treatment for the client, or could be viewed as being used for this purpose
- Information is used or withheld to change decisions about the service provided to a client
- An employee directly manages property or finances on the clients behalf

These circumstances clearly cause a conflict which can undermine the client/employee relationship, does not meet the standards as described, and as a result is unacceptable. Section 1-3 of the Professional and Personal Boundaries sets out the action that will be taken if behaviour and conduct is inappropriate. We expect these situations to be rare and disciplinary action will only normally be taken where there is a clear abuse of power and wilful intent by the employee.

General Guidance and Examples

We do not want to stifle initiative, stop customers from receiving a good service, or prevent staff from 'going above and beyond'. In fact one of our values is about realising customer and staff potential. However, you do need to consider how to act and what the consequences of your action might be to help with your decision making. This guidance is aimed at providing some practical examples of situations that may arise and how to resolve them.

Example1

A client who has been struggling to overcome alcohol issues has finally opened up and agreed to getting support but is scared of going to the GP and taking the first step towards asking for help. Our support worker agrees to arrange to meet the customer on this occasion at the GP prior to the appointment to provide that extra support to overcome the barrier and then to ring them after to see how they got on.

Example 2

A client has telephoned you to say that his child's cot has broken and although he has been round to relatives and second hand shops, got in touch with Help Direct and even the Salvation Army he cannot find one anywhere and is desperate for one so that the baby to sleep in that night. He asks if you can help. Earlier that day you heard a colleague say that their sister is selling a cot for £10. So you ask your colleague to confirm best way for the cot to be delivered in exchange for £10 which you then pass on to the colleague's sister. The grateful client buys you a £3 box of chocolates as a thank you.

As you can see from the 2 examples they do not readily fit into the established standards- they can be seen as 'going the extra mile' or,

possibly, 'crossing' professional boundaries. **In these examples we are clear they are 'going the extra mile'.**

Whether it is a similar set of circumstances or a unique situation we have developed a way that can help you come to a decision which has been thought through and continues to protect both you and the client. The technique below will therefore ensure that you have acted appropriately and within the expected behaviour boundaries.

There are 4 key steps in the **SOAR** technique:

Sum up the situation and use your **S**enses to think about the issue:

- Does it feel right?
- What would it sound like if the tale was relayed back to you?
- What would people think?
- What would your manager think?
- How would it be perceived?
- What would the impact of the decision be?

Options – consider what you options are:

- You need to act quickly without referring to someone else
- If there is no urgency, can you seek guidance?
- If it does not meet the Senses criteria – should you do anything?

Action required-

- Consider whether the action you are proposing to carry out, would be taken for any client or are you given preferential treatment in this instance.
- If urgent - make a decision based on what you know, see, and feel to be right
- Non urgent – ask your manager or talk to an experienced colleague before making a decision
- If in doubt take no action

Review and **R**ecord

- Always tell someone about what you did and why
- Let your manager know – even if you had to act because it was urgent and tell them afterwards
- Review the decision with your manager and as a team (if appropriate) to determine what if any further steps need to be taken

This last stage is very important as it provides evidence of why you took action in the way you did and whether in future you may need to do things differently.

Your manager is there to help and support you in these situations. As a result of the review they may decide to:

- Confirm you took the right course of action
- Award a Calico Star
- Recommend a different course of action in future
- Decide the action you took was appropriate as a one off only due to the circumstances

- Provide further training and advice

NB Disciplinary action will only be considered if it was felt there is a very clear and significant breach of the standard.

The **SOAR** test will help you to rise above the issue, take a quick decision if necessary, consider what is best and ensure you act with the best intentions.

You will be provided with further guidance and example as part of a team briefing session aimed at explaining the standards and talking through some of the scenarios you may come across. New starters should be briefed as part of their induction into their new role.

Declaration

Appendix 2

As part of the Company's governance procedures we are required to obtain an annual declaration from both staff and board members noting any interests within various categories as shown below

Question	Response
Details of membership of other organisations of which you are a member or serve on a Committee or Board.	
Details of membership of any organisation not generally open to the public that may have secrecy about its rules or membership. (See employee code of conduct)	
Details of membership of any organisation which may give rise to a "conflict of interest" with the Company and its work.	
Details of your current employment (other than employment by The Calico Group. Staff must declare any employment additional to the Company's.)	
Details of any close friend or relatives who are tenants, members of staff or members of the Board (If you are a Calico tenant please provide your address here)	
Are you a friend or close family member of key management staff (SLT/Company Directors/ Chief Executive)	
Details of any organisation in which you or any close relative or close friend may have an interest that is engaged in business with the Company.	
As far as I am aware I hereby confirm that the information given above is complete and accurate. I also confirm I am aware of my obligations as detailed in the Board Members Handbook/Employee Code of Conduct in respect of gifts and hospitality and ongoing declarations of interest arising during the year.	
Name:	
Signature:	
Date:	

Please attach this completed form to Itrent My Zone portal on your Personal Details section (use the paperclip icon)

This information will be shared with appropriate persons as per company procedure and follow up action may be required subject to the nature of the information disclosed.

Declaration reviewed by:-

Action taken/required:-

GIFTS/HOSPITALITY AND WILLS

**Guidelines for
Staff Dealing with Customers, Clients and Residents**

Gifts

It is accepted that staff providing customers with support within the Company will get to know their clients very well. They provide an on-going service to their tenants and clients and there will be times when a customer (or a relative) wishes to show their appreciation with a gift. These staff may accept small presents such as flowers or a box of chocolates up to a value of £25 but they should never accept gifts of money.

The family of a deceased tenant, customer or client may wish to thank the Calico member of staff for his/her care of their relative. It should be explained to them that Calico staff are not allowed to accept gifts of money. In schemes, they may be directed to, making a donation to the social fund for the benefit of the residents this will be gratefully received. The treasurer will enter the amount in the accounts book as a donation from the family of Mrs/Mr X.

At some sheltered schemes the tenants may like to make a collection for the Home Support Officer at festive times, such as Christmas. To avoid receiving thirty or more boxes of chocolates, it is quite in order for the Home Support Officer to indicate what she/he would like the tenants to buy with the money they have collected, but the Home Support Officer must not accept the cash.

Acceptance of Gifts

Gifts over the value of £25 should be accepted should be declared using the gifts and hospitality form.

Wills

Calico staff may witness wills for their tenants if asked to do so, but they should not agree to act as executors. To do so would be perceived as a conflict of interest. This complex and time consuming job should be left to the tenant's family or to professions such as solicitors or banks.

Any bequests that a customer makes to a member of Calico staff in his/her will should be reported to their line manager and declared using the gifts and hospitality form. The bequest must be donated to an appropriate charity.

If a member of Calico staff is in any doubt that she/he is acting correctly in accepting a gift for services she/he has provided in the course of his/her duties, the Manager or the Team Leader will give guidance.

DECLARATION OF GIFT OR HOSPITALITY FORM

I wish to declare that the following gift/hospitality* was given/offered* to me and that I took the action detailed below:

Gift/Hospitality Offered

Reason for Gift/Hospitality Offered.

Action Taken: **(Please tick appropriate box)**

- 1. Gift/Hospitality as detailed accepted and reported to the Chief Executive/Director
- 2. Gift/Hospitality accepted and passed to the Chief Executive/ Director for distribution to staff at appropriate time. i.e. Christmas
- 3. Gifts/Hospitality accepted and donated to charity/ raffled for charitable cause.

Employee	Manager
Signed	Signed
Name and position	Name and position
Date	Date

Please complete and forward to the Director of Finance.

The Director of Finance will keep a record of this gift.