The Whiteley Homes Trust

Code of Conduct Policy

Written By	Head of People & Culture and Head of Community Services
Owner	Chief Executive
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Review Period	Annually or sooner following legislative or regulatory change, or organisational change
Next Review Date	July 2027
EIA	Yes

Review Tracker

Review Date	Reviewed by	Changes Made	Approved by	Approved date	Version
July 2026	**Chief Executive**	**New policy developed to establish clear behavioural expectations and standards of conduct for everyone living, working, volunteering or representing The Whiteley Homes Trust.**	**People and Culture Committee (PCC) to then recommend to Board**	**15 September 2026**	**1.1**

Introduction

At The Whiteley Homes Trust ("the Trust"), we believe that how we behave is just as important as what we do. Every interaction shapes the experience of living and working in Whiteley Village.

Our purpose is to provide outstanding homes and services for older people of limited means, supporting residents to live independently with dignity for as long as possible. Achieving this depends on everyone treating one another with respect, integrity, and care.

We recognise that every decision and every interaction shapes the long-term future of Whiteley Village. Everyone associated with the Trust has a responsibility to act in the best interests of current and future residents, safeguarding our charitable purpose and helping to ensure Whiteley Village continues to thrive for generations to come.

This Code of Conduct sets out the standards of behaviour expected of everyone who lives in, works for, volunteers with, governs or represents the Trust. It provides a shared framework for how we communicate, make decisions, work together and resolve differences respectfully.

We are committed to creating a community where residents, employees, Trustees, volunteers, contractors and visitors feel safe, valued, listened to and treated fairly. As a Registered Provider of Social Housing, we maintain the highest standards of integrity, accountability and transparency, welcoming constructive challenge and honest conversations as part of our commitment to putting residents at the heart of everything we do.

Together, we all share responsibility for upholding this Code and helping to make Whiteley Village a place where people feel respected, supported and proud to belong.

Scope

This Code of Conduct applies to everyone involved with The Whiteley Homes Trust. It applies to:

- Residents, including beneficiaries, tenants and members of their households, visitors and family member. Throughout this code, these groups are referred to collectively as *"Residents"* for clarity and ease of reference.
- Employees, including agency workers, bank workers and volunteers. Throughout this code, these groups are referred to collectively as "employees" for clarity and ease of reference.
- Trustees
- Contractors, consultants, suppliers and professional advisers
- Visitors undertaking activities on behalf of the Trust
- Anyone representing or acting on behalf of the Trust

This Code applies whenever individuals are:

- Living, working or volunteering within Whiteley Village
- Carrying out work or providing services on behalf of the Trust
- Representing the Trust or attending Trust meetings or events
- Communicating in connection with the Trust, including by telephone, email, written correspondence, social media or other digital platforms

Whilst the responsibilities of each group may differ, everyone is expected to uphold the standards of behaviour set out in this Code and contribute to a respectful, safe and inclusive community.

Purpose

The purpose of this Code is to establish clear and consistent standards of behaviour that support a safe, respectful and inclusive community where everyone is treated fairly, with dignity and respect. It reinforces our shared responsibility to support decisions and behaviours that are in the best interests of current and future residents and the long-term sustainability of the Trust. This Code aims to:

- Set clear expectations for everyone who lives in, works for, volunteers with or represents the Trust.
- Promote behaviours that reflect the Trust's values and support ethical, fair and accountable decision-making.
- Foster a culture of integrity, respect, accountability and professionalism.
- Encourage people to speak up, provide feedback and raise concerns appropriately.
- Protect the wellbeing, safety, information, resources and reputation of the Trust.
- Support compliance with the Trust's policies and legal and regulatory responsibilities.
- Promote continuous learning, improvement and responsible stewardship to help ensure Whiteley Village continues to thrive for future generations.

By living these principles every day, we strengthen relationships, build trust and create a community where residents, employees, Trustees, volunteers and partners feel respected, valued and proud to belong.

Our Values

Our values underpin everything we do and are reflected throughout this Code. The Whiteley Homes Trust values are:

- Respect
- Integrity
- Ambition
- Involvement
- Caring

These values are brought to life through the **Behaviour Charter** and the standards of behaviour set out in this Code.

Everyone is expected to demonstrate these values in their daily behaviour, whether interacting with residents, colleagues, Trustees, volunteers, contractors or visitors.

Standards of Behaviour

Everyone associated with the Trust is expected to behave in a way that reflects our values, supports our charitable purpose and contributes positively to the Whiteley Village community. Our behaviour should build trust, protect the wellbeing of others and help create a safe, respectful and inclusive environment for everyone. We will:

Respect Others

- Treat everyone with dignity, courtesy and respect.
- Listen to understand and value different views and experiences.
- Communicate honestly, professionally and constructively.
- Value diversity and inclusion and never discriminate, bully, harass or intimidate others.
- Resolve disagreements respectfully and seek constructive solutions.

Act with Integrity

- Act honestly, ethically and in the best interests of current and future residents.
- Make decisions fairly, responsibly and without personal gain or improper influence.
- Be accountable for our actions and decisions.
- Declare actual, potential or perceived conflicts of interest promptly.
- Protect and promote the Trust's reputation through our behaviour, communications and decision-making.

Maintain Professional Standards

- Always behave professionally and responsibly.
- Maintain appropriate professional boundaries and avoid situations that could compromise our judgement or create actual or perceived conflicts of interest.
- Respect confidentiality and use information appropriately.
- Comply with the Trust's policies, procedures and legal responsibilities.
- Take responsibility for maintaining the knowledge, skills and competence needed to perform our role effectively.
- Welcome feedback and seek opportunities to learn and improve.

Promote Health, Safety and Wellbeing

Everyone has a responsibility to contribute to a safe, secure and healthy environment for residents, employees, volunteers, contractors and visitors. We will:

- Take reasonable care of our own health, safety and wellbeing, and that of others.
- Follow the Trust's health and safety, safeguarding and emergency procedures.
- Report hazards, accidents, near misses, safeguarding concerns and unsafe practices promptly.
- Cooperate with actions taken to reduce risk and improve safety.
- Never knowingly place ourselves or others at unnecessary risk.

Use Technology Responsibly

Use the Trust's digital systems, devices and information responsibly and only for authorised purposes. We will:

- Protect confidential, personal and commercially sensitive information.
- Follow the Trust's cyber security and information governance requirements.
- Report suspected cyber incidents, data breaches or security weaknesses promptly.

- Use artificial intelligence (AI) and emerging technologies responsibly, transparently and in accordance with the Trust's policies. AI should support, not replace, professional judgement or accountability.
- Never misuse digital systems or technology to bully, harass, discriminate against or intimidate others, or to bring the Trust into disrepute.

Care for Our Environment and Resources

We all have a responsibility to help protect Whiteley Village and use the Trust's resources responsibly. We will:

- Consider the environmental impact of our decisions and day-to-day activities.
- Use energy, water, equipment and other resources responsibly, avoiding unnecessary waste.
- Support recycling, reuse and sustainable working practices wherever practical.
- Help protect the Village's buildings, grounds, woodland and natural environment.
- Report environmental risks, damage or pollution promptly.

Support Our Community

- Listen to residents, value their feedback and use it to help improve services and the resident experience.
- Treat Whiteley Village, its people, buildings and shared spaces with care and respect.
- Work collaboratively and support one another.
- Encourage participation, feedback and constructive challenge.
- Help create a welcoming, inclusive and thriving community.
- Act as positive ambassadors for the Trust and uphold our values in everything we do.

Decision Making and Integrity

Everyone associated with the Trust has a responsibility to make decisions and act in a way that supports the best interests of current and future residents, protects the Trust's charitable purpose and contributes to the long-term sustainability of Whiteley Village.

When making decisions, we will:

- Act lawfully and in accordance with the Trust's governing documents, policies and delegated authorities.
- Base decisions on evidence. While exercising professional judgement and applying the Trust's values, fairness and equity
- Consider the impact of our decisions on current and future residents, the Trust, the wider community and the environment.
- Use the Trust's resources responsibly and in a way that supports the Trust's charitable purpose, current and future residents, and the long-term sustainability of Whiteley Village. Be transparent wherever possible, while respecting confidentiality and data protection requirements.
- Be able to explain and justify our decisions.

Anyone acting on behalf of the Trust must avoid situations where personal interests could influence, or be perceived to influence, decision-making. Any actual, potential or perceived conflicts of interest must be declared promptly in accordance with the Trust's Conflicts of Interest Policy.

Professional Boundaries

Positive relationships are central to life at Whiteley Village. We encourage kindness, compassion and mutual respect while recognising the importance of maintaining appropriate professional boundaries. Clear boundaries help protect residents, employees, Trustees, volunteers and the Trust, ensuring that decisions remain fair, objective and free from undue influence.

Everyone acting on behalf of the Trust will:

- Maintain professional relationships that are respectful, appropriate and impartial.
- Avoid situations where personal relationships could influence, or be perceived to influence, professional judgement or decision-making.
- Treat all residents fairly and consistently, without favouritism or preferential treatment.
- Respect privacy and confidentiality and use information only for legitimate purposes.
- You must declare at the earliest opportunity any personal relationship, interest or connection with residents, employees, Trustees, contractors or suppliers where this could, or could reasonably be perceived to, influence your role, judgement or decision-making.
- Seek advice from a Head of Department, the Leadership Teamor the Chair of the Board (where applicable) if they are unsure whether a situation could compromise professional boundaries.

Those acting on behalf of the Trust must not:

- Exploit their position or relationship with a resident, colleague or volunteer for personal benefit.
- Accept or offer gifts, hospitality or other benefits that could improperly influence, or be perceived to influence, decisions or relationships, other than modest items permitted under the Trust's Gifts and Hospitality Policy.
- Borrow money from, lend money to or enter into financial arrangements with residents, except where expressly authorised by the Trust.
- Encourage or influence residents to include them in a will, trust or other financial arrangement, or accept any personal benefit arising from their position without the Trust's knowledge and approval.
- Develop personal relationships that could compromise professional judgement, create a conflict of interest or undermine public confidence in the Trust.

Concerns about professional boundaries should be raised promptly so that appropriate advice and support can be provided.

Behaviour That Will Not Be Accepted

The Trust is committed to maintaining a safe and respectful environment. The following behaviours are unacceptable and include, but are not limited to, those listed below. To help maintain a safe and respectful environment, the Trust will address any such behaviour through the appropriate policies, procedures or legal agreements

- Bullying or harassment
- Discrimination, victimisation or intimidation
- Abusive, threatening or aggressive behaviour
- Physical violence or threatening conduct
- Offensive, racist, sexist, homophobic or discriminatory language
- Malicious, knowingly false or misleading allegations
- Deliberately spreading misinformation
- Abuse of position or authority
- Retaliation against anyone who raises a concern in good faith
- Deliberate damage to trust property
- Misuse of confidential information
- Behaviour likely to bring the Trust into disrepute including use of digital or social media platforms
- Knowingly disregarding health and safety or safeguarding requirements
- Exploiting professional relationships or breaching professional boundaries
- Deliberately compromising information security or misusing digital systems or artificial intelligence

The Trust operates a zero-tolerance approach to physical violence, threatening behaviour, hate incidents and abuse directed towards residents, employees, volunteers, Trustees,contractors,or visitors

Speaking Up and Raising Concerns

The Trust encourages an open and positive culture where concerns can be raised without fear of unfair treatment or victimisation. Everyone should feel confident to:

- Ask questions
- Challenge decisions respectfully
- Suggest improvements
- Report unsafe practices
- Raise concerns about unacceptable behaviour
- Report suspected fraud, misconduct, safeguarding concerns, breaches of health and safety requirements or other unethical or unlawful behaviour.

Concerns should normally be raised through the appropriate manager or relevant Trust procedure.

Residents may raise concerns through the Trust's Complaints Policy or other resident engagement arrangements.

Employees may also raise concerns through the Trust's Whistleblowing Policy where appropriate.

The Trust will:

- Listen carefully
- Investigate concerns fairly and objectively
- Treat information sensitively
- Protect confidentiality wherever possible
- Ensure no one suffers detriment for raising genuine concerns in good faith

Everyone covered by this Code has a responsibility to report concerns about fraud, misconduct, safeguarding issues and health and safety risks, breaches of this Code or any behaviour that may place residents, colleagues, volunteers, visitors or the Trust at risk.

Responsibilities

Creating a respectful, inclusive and professional culture is everyone's responsibility.

Board of Trustees: The Board is responsible for:

- Setting the tone and culture of the organisation
- Approving this policy
- Receiving assurance that expected standards are being maintained
- Promoting good governance and ethical leadership
- Leading by example and demonstrating the standards expected under this Code

Chief Executive Officer: The Chief Executive Officer is responsible for:

- Promoting a positive organisational culture
- Ensuring this policy is implemented
- Ensuring appropriate resources, training and support are available
- Reporting significant behavioural risks or themes to the board where appropriate

Executive Leadership Team and Heads of Department (HODs): The Executive Leadership Team and HODs will:

- Lead by example
- Ensure consistent application of this policy
- Monitor organisational culture
- Address unacceptable behaviour promptly

Managers: Managers are responsible for:

- Demonstrating the Trust's values
- Supporting employees
- Addressing concerns fairly and consistently

- Encouraging open communications
- Resolving issues wherever possible at an early stage.

Employees: Employees are expected to:

- Comply with this Code
- Demonstrate the Trust's values
- Treat everyone respectfully
- Raise concerns appropriately
- Contribute positively to the Trust's culture

Residents: Residents are encouraged to:

- Support a respectful community
- Treat everyone with courtesy and consideration
- Engage constructively with the Trust and contribute positively to the Whiteley Village community.
- Respect fellow residents, employees, volunteers, trustees and contractors

Contractors and Volunteers: Anyone providing services on behalf of the Trust is expected to uphold the principles contained within this Code whilst undertaking activities for the Trust.

Compliance, Monitoring and Review

Everyone covered by this Code is responsible for understanding and complying with its requirements. The Trust expects the highest standards of behaviour and will take appropriate action where these standards are not met. The Trust will:

- Promote awareness of this Code through induction and ongoing communication.
- Monitor compliance through day-to-day management, governance arrangements, audits, investigations and other assurance activities, where appropriate.
- Encourage concerns or breaches of this Code to be raised promptly so they can be addressed fairly, consistently and confidentially.
- Investigate alleged breaches in accordance with the Trust's policies and procedures, ensuring individuals are treated fairly and in line with the principles of natural justice.
- Take appropriate action where breaches are substantiated, which may include informal action, disciplinary action, termination of employment, removal from office, termination of contracts or other appropriate measures, depending on the circumstances.
- Review this Code regularly to ensure it remains effective, reflects changes in legislation, regulation and best practice, and continues to support the Trust's values and charitable purpose.

The Board has overall responsibility for approving this Code and overseeing its effectiveness. The Leadership Team is responsible for promoting compliance and embedding the standards set out in this Code across the organisation.

Everyone associated with the Trust shares responsibility for upholding this Code and helping to create a community where residents, employees, Trustees, volunteers and partners are treated with respect, integrity and care. By living these standards every day, we protect our charitable purpose and help ensure Whiteley Village continues to thrive for current and future generations.

Related Policies and Guidance

This Code should be read alongside the Trust's other policies, procedures and guidance, which together support the standards of behaviour expected across Whiteley Village. These include, but are not limited to:

- Employee Handbook
- Resident Handbook
- Safeguarding Policy
- Health and Safety Policy
- Equality, Diversity and Inclusion Policy
- Complaints Policy
- Disciplinary Policy
- Grievance Policy
- Whistleblowing (Speak Up) Policy
- Conflicts of Interest Policy
- Gifts and Hospitality Policy
- Information Governance and Data Protection Policies
- Social Media Policy
- Procurement Policy

Where there is any inconsistency between this Code and another Trust policy or procedure, the specific policy or procedure should be followed. Individuals should seek advice from their Head of Department, the Leadership Team or the appropriate Trust representative if they are unsure how this Code applies in a particular situation.

Appendix A – Regulatory and Legislative Framework

Whilst this Code is values-led, it also supports the Trust's compliance with relevant legislation, regulatory standards and recognised good practice.

Primary Legislation

The Trust has regard to, but is not limited to:

- Equality Act 2010
- Health and Safety at Work etc. Act 1974
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Human Rights Act 1998
- Public Interest Disclosure Act 1998
- Employment Rights Act 1996
- Bribery Act 2010
- Fraud Act 2006
- Social Housing (Regulation) Act 2023
- Housing Act 1996
- Localism Act 2011 (where applicable)
- Protection from Harassment Act 1997

Regulatory Requirements

This policy supports compliance with the expectations of:

- Regulator of Social Housing – Transparency, Influence and Accountability Standard (including the forthcoming STAIRS requirements)
- Regulator of Social Housing – Neighbourhood and Community Standard
- Regulator of Social Housing – Safety and Quality Standard
- Regulator of Social Housing – Governance and Financial Viability Standard
- Housing Ombudsman Complaint Handling Code
- Charity Commission Guidance for Trustees
- National Housing Federation Code of Governance (where adopted)
- Almshouse Association guidance and good practice