

Code of Conduct Policy

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IMPACT ASSESSMENTS				
Equality Impact Assessment				
Completed? <input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Yes	
	If not required, state reason:			
Resident Impact Assessment				
1) Is this one of the agreed policies requiring resident consultation? Please refer to:	Yes	<input type="checkbox"/>	No	
2) If yes, please confirm resident consultation has taken place	<input type="checkbox"/>	Briefly detail changes arising from resident feedback:		
APPROVAL - To show transparency and accountability, specify whether policies have been approved by the Board/Executive/Committee. Clear approval lines strengthen governance, ensuring assurance and accountability.				
Approval journey:	Executive Team	Committee		Board
		Yes	Committee name(s)	
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	NA	<input type="checkbox"/>
Which Regulatory Standard does this Policy support?	Economic			
	Governance & Viability	Rent		Value for Money
	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
	Consumer			
	Neighbourhood & Community	Safety & Quality	Tenancy	Transparency, Influence & Accountability
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Associated legislation				
Associated procedures				
Where is this policy to be published?	Website	Intranet	Both	
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Code of Conduct Policy

1. Policy Statement

SettleParadigm is an organisation that publicises and upholds the highest standards for values and behaviours.

This Code of Conduct forms part of the SettleParadigm Code of Governance. SettleParadigm has also adopted the National Housing Federation's Code of Governance which provides a wider point of reference.

The Code is supported by a suite of policies and procedures, (as set out below). However, it cannot cover every situation. Good judgement must be applied even where the code does not contain specific requirements.

Failure to comply with the provisions of the Code of Conduct will be viewed as a disciplinary matter. For staff, such matters will be dealt with under normal disciplinary procedures. For members of the Board non-compliance will be considered further to the provisions of the terms of appointment and within the rules of SettleParadigm.

2. Objectives, desired outcomes and strategic alignment

The objective of the Code of Conduct is to:

- promote a culture that enables and supports individuals to deliver the best possible service for our residents and
- ensure that those working for SettleParadigm maintain the highest standards of conduct, probity and ethics at all times.

3. Scope

This Code of Conduct applies to:

- Board and Committee members,
- All staff including those whose engagements with SettleParadigm are temporary.
- Residents who are part of the governance or other decision-making processes of SettleParadigm, including formal engagement mechanisms, (but not those who respond to requests for opinion or feedback).

All contractors, professional advisors and consultants working with or for SettleParadigm are required to understand the Code of Conduct, uphold its principles and values and not to do any act in contravention of it.

Circumstances when a member of staff passes on information concerning wrongdoing or danger at work fall within the scope of the Whistleblowing Policy and not this Code.

The Code does not form part of any employee's contract of employment, and it may be amended at any time.

4. Policy Principles

SettleParadigm's Code of Conduct is set out in 4 sections, each with a set of principles and detailed expectations, as follows:

- 4.1 Acting in the best interests of SettleParadigm and its residents
- 4.2 Behaving with integrity
- 4.3 Conducting yourself professionally and treating others well
- 4.4 Protecting yourself, others and the environment

Where requirements apply differently to different groups (Board members, employees etc) subheadings are used within the relevant section to distinguish them.

4.1 Acting in the best interests of SettleParadigm and its residents

You have a responsibility to carry out your role in line with the purposes and values of SettleParadigm.

Meeting your responsibilities

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

The following is expected of all:

- You must always fulfil the requirements of your role to the best of your ability. If any circumstances arise that limit your ability to meet your responsibilities, you must raise this through the appropriate channels.
- In carrying out your role, you must always seek to further SettleParadigm's strategic objectives, reflecting SettleParadigm's desired culture.
- You must not act in a way that discriminates against, or unjustifiably favours, particular individuals, groups or interests, including on the basis of any protected characteristics they may have.

- You must consider the impact of your actions on the safety and wellbeing of residents.

The following is expected of staff members:

- You must consult your manager before taking any other paid or voluntary work that may interfere with your existing job, or conflict with terms set out in your contract of employment.

The following is expected of Board Members:

- You must respect the principle of collective decision-making and corporate responsibility.
- You must ensure that you declare to SettleParadigm any relevant personal relationships, employment and other appointments you hold, and that these do not interfere with your ability to perform or conflict with your role as a board member.

Representing SettleParadigm

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

The following is expected of all:

- In representing SettleParadigm, you must act in accordance with its values, policies and goals.
- You must not conduct yourself in a manner which could reasonably be regarded as bringing SettleParadigm into disrepute.
- You must not make derogatory, false or otherwise damaging comments, in person or through any medium, about SettleParadigm or any person, service or organisation connected with it.
- You must not seek to officially represent the views or position of SettleParadigm without prior authority.
- You must adhere to SettleParadigm's policies in the use of e-mail, intranet and internet services including social media.
- When representing SettleParadigm through any medium, including social media, you must at all times act with professionalism.
- Where any personal social media accounts refer to your role with SettleParadigm, you must make it clear in what capacity you are communicating.
- You should avoid making any social media communications that may damage SettleParadigm's reputation or ability to pursue its charitable objectives, including by:
 - using social media to defame or disparage SettleParadigm, members of the Board or staff, residents or any third party; to harass, bully or unlawfully discriminate against

- staff or third parties; to make false or misleading statements; or to impersonate colleagues or third parties;
- making representation on behalf of SettleParadigm without the authority to do so;
- disclosing, making comment on or making representations about, commercially sensitive or confidential information;
- including SettleParadigm trademarks or logos in any social media posting or in your profile on any social media with the exception of employment reference on LinkedIn.
- If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect SettleParadigm, you must obtain prior consent. Such consent must not be unreasonably withheld unless your activity poses a material risk to SettleParadigm.
- The nature of SettleParadigm’s work may involve the organisation in policy matters which are the subject of political debate. SettleParadigm is not a political organisation and does not support directly or indirectly any political party. SettleParadigm is a non-political entity whose aims are to pursue its charitable objectives.
- Members of the Board or staff may be involved in organised political activity in their lives away from SettleParadigm but are not to involve or associate SettleParadigm with such activities. SettleParadigm, when making a policy representation within the political sphere, will do so in a balanced non-partisan manner in promotion of its objectives to provide high quality homes and housing services.

The following is expected of Board Members

- Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or long-standing, and in the opinion of the board cannot be managed appropriately.

4.2 Behaving with integrity

The reputation and good name of SettleParadigm depends on compliance with this Code; with our policies and procedures, and on the integrity of individuals that work for SettleParadigm.

Conflicts of interests

You must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between your duties to SettleParadigm and your personal interests, other duties and relationships. This Code must be read in conjunction with SettleParadigm’s Conflict of Interests Policy as detailed below.

The following is expected of all:

- You must formally declare to SettleParadigm, at the earliest opportunity, any interests which may, or may be perceived to or may in the future, conflict with the duties of your role.
- You must declare, by informing your line manager or HR and completing a Declaration of Interest form, of any known relationship to a person applying for or performing a role within SettleParadigm.
- You must not be involved in the appointment, performance management or reward of a relative, close friend or partner.
- You must not be involved in the direct or indirect line management of, a relative, close friend or partner. In this context “indirect” refers to circumstances where you are the line manager’s manager or more senior leader.
- You must declare any known relationship to a resident, potential resident or other customer of SettleParadigm. You must not be involved in decisions relating to their relationship with SettleParadigm or seek or accept preferential treatment for them.
- You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to SettleParadigm and must not be involved in their appointment, performance management or reward.
- Except where specifically permitted, you must avoid using its contractors and suppliers for private purposes.
- You must not use, or attempt to use, your position to promote personal interests or those of any connected person, business or other organisation for personal gain.
- SettleParadigm may not make payments to or give any form of benefit to a member of the Board or staff, or their close relatives, except where this is specifically allowed by a contract of employment, or one to provide services.
- A member of the Board or staff may not receive housing by SettleParadigm, other than by either a statutory right, or other approved method, without the prior approval of the Executive Director – Customer and the Chief Executive.

The following is expected of Board Members:

- Individuals with a conflict should follow the Conflicts of Interest Policy and any arrangements put in place by the Chair which may include not taking part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or long-standing, and in the opinion of the Board cannot be managed appropriately.

Declaration of Interests

Board and Committee members and members of staff are required to sign a Declaration of Interest Form before taking up their appointment and at a minimum, annually thereafter. As

conflicts arise members of the Board and staff should make the appropriate disclosures in meetings and/or to the Chair or their line managers and complete a new Declaration of Interest Form immediately.

Declaration of Interest forms for all board members and staff will be held in a register by the Group General Counsel which may be open to public scrutiny.

Should any Board or Committee member require advice about their outside interests and the need to make a disclosure they should seek the advice of the Group General Counsel. Staff should speak with their line manager or HR Business partner should they have any doubt about the need to declare a matter.

In any case of uncertainty, staff, Board or committee members should always make an entry into the “Declaration of Interest” Register.

The Declaration of Interest Form addresses circumstances where you or your close relative could in theory receive a personal or business benefit (other than salary and/or expenses) as a consequence of either your employment or appointment to provide services.

The two main examples where a benefit could occur are:

- A Duality of Interest - this is where the circumstances could potentially bring about some personal or business gain.
- A Conflict of Interest - this is where both a SettleParadigm interest and a personal/business interest exist and may conflict.

In the case of Board and Committee members, any interest in any matter on the agenda must be declared at the start of each Board meeting and this will be noted in the Declaration of Interest register. Board and committee members may not subsequently take any part in discussion about the matter in question and may not vote on this matter.

Staff members must disclose any office held with another housing organisation or with one of SettleParadigm’s partners or stakeholders, including membership of the board or committee, or any on-going relationship with that organisation; and any potential duality or conflict of interest that may arise as a result of their dealings or contacts outside work with a partner, stakeholder, professional adviser, contractor or consultant who works with or provides services to SettleParadigm.

The types of interests which must be declared could include, but are not limited to the following:

- A personal or family interest in any property being purchased, sold, leased or let by SettleParadigm.

- A personal or family interest in any company selling or marketing any property being purchased or leased by SettleParadigm.
- A business or personal relationship with any person or firm earning fees from work placed by SettleParadigm.
- A business or personal relationship with any person or firm entering into a contract to carry out work for SettleParadigm.
- Any matters relating to housing provided by SettleParadigm; this covers a situation where your relatives are housed by SettleParadigm.
- Any matters relating to services provided by SettleParadigm; this covers a situation where your relatives are providing services to SettleParadigm.
- Any matters relating to employment with SettleParadigm. This covers a situation where your relatives are also employed by SettleParadigm.
- Any interests which may or may be perceived to, or may in the future, conflict with the duties of your role.

Except where specifically permitted, you must avoid using its contractors and suppliers for private purposes.

You must not use, or attempt to use, your position to promote personal interests or those of any connected person, business or other organisation for personal gain.

Personal relationships

Prior to employment or engagement with SettleParadigm, applicants to be a member of the Board or staff are required to declare any relationship with an existing member of the Board or staff. This includes family members, partners or close family friends. Canvassing of existing members of staff, Board or committee members to secure employment with the Group is not permitted in any way. Any offers of employment to a relative or partner of an existing member of the Board or staff will be as a result of our standard selection procedures being followed and, in the case of Board or committee members, will be the subject of confirmation by the Common Board.

New personal relationships forming within the workplace must be declared at the earliest opportunity.

During the course of employment or engagement with SettleParadigm, members of the Board or staff should bear in mind the impact of any personal relationships on colleagues. In particular you should be aware of the possible perceptions of other colleagues about the relationship and its possible impact on work-related matters.

In circumstances where a personal relationship exists at work, the following steps should be taken to ensure that an individual's personal integrity and judgement cannot be called into question:

- No part should be played in the appointment or promotion of a relative or partner.
- An employee may not take any part in the line of management of a relative, close friend or partner, directly or indirectly.
- In situations when new relationships are disclosed:
 - Line management arrangements should be reviewed and organised so that responsibility for performance appraisal and any matters relating to levels of remuneration are kept separate from the relationship and are reviewed by an independent person.
 - Separate arrangements should be put in place for processing claims for legitimate business expenses.
 - Work matters that are confidential or sensitive and which are not widely known by others within the Group should not be shared with the relative or partner.

SettleParadigm reserves the right to put in place alternative line management arrangements where it believes it would be in the best interests of SettleParadigm and this Code of Conduct.

Bribery

In your role with SettleParadigm, you must not offer, seek or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisations. You must not seek or accept preferential treatment in the provision of benefits such as housing accommodation or employment. Giving and receiving of gifts creates a relationship that can be seen to influence judgement. Therefore, no personal gifts with a significant monetary value may be accepted.

The following is expected of all:

- You must not offer, seek or accept bribes or inducements to act improperly or corruptly.
- You must not seek or accept gifts (including personal gifts and cash), hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisations.
- You must not seek or accept gifts from residents or potential residents.
- You must not seek or accept preferential treatment in the provision of benefits such as housing accommodation or employment.

- You must not solicit or seek gifts or hospitality or other benefits. Any gifts or hospitality offered to or by you must be either declared or declined according to SettleParadigm's policies. If you are offered a bribe, hospitality or a gift which is or may be in return for expected preferential treatment, you must decline and declare this immediately to the appropriate person.
- Any gifts or hospitality offered to or by you must be either declared or declined according to SettleParadigm's policies.
- If you are offered a bribe, hospitality or a gift, which is or may be in return for expected preferential treatment, you must decline and declare this immediately to the appropriate person.
- For further information and guidelines see the Anti-Bribery Policy

Gifts & Hospitality

Anyone offering gifts should be asked to donate them for the benefit of residents or to the Group's charitable donations fund. Gifts to another individual or organisation are only to be made in exceptional circumstances with the approval of an Executive Director or Chairman of a board or committee.

You should always avoid gifts except in the very limited circumstances below:

- Only small personal gifts (e.g., diaries, calendars, stationery) may be accepted and no gift with a monetary value of over £15 should be accepted under any circumstances.
- Any other gifts received should either be refused or donated to the annual SettleParadigm raffle whose proceeds are donated to designated charities (in the absence of the raffle gifts be used for a charitable purpose most likely by sale).

All gifts offered must be recorded in the Hospitality Register held with the Governance Team, even if the offer was declined.

Members of the Board and staff must not solicit hospitality. Where reasonable and proportionate hospitality is offered it may be accepted provided it is declared in the hospitality register. Before accepting any hospitality, you should first consider whether its acceptance may create or will be perceived to create an obligation to the provider of the hospitality. If a reasonable person would conclude that the acceptance of the hospitality may create such an obligation the hospitality should be refused.

For further information and guidelines see the Gifts & Hospitality Policy.

Funds, resources and personal benefit

You must not misuse SettleParadigm's funds or resources or seek preferential treatment for your own personal benefit. No personal benefit to individuals or Groups of Staff, Board or committee members is permitted.

Expected of all

- You must ensure that SettleParadigm's funds and resources are used properly and efficiently.
- Your procurement decisions must be guided by SettleParadigm's policies and fairness in decision-making and in line with relevant law.
- You must take all reasonable measures to protect SettleParadigm's funds, resources, property and assets from fraud, theft, damage and misuse.
- If you claim reimbursement for any expenses, you must do so in line with SettleParadigm's policies and procedures.
- You should separate your personal purchasing from that undertaken by SettleParadigm to avoid the suspicion of securing personal preferential treatment by suppliers.
- There are more stringent rules for those who are in decision-making positions. You should not use SettleParadigm suppliers for your own personal matters except where it would be unreasonable not to do so. You should not seek to secure preferential treatment from the SettleParadigm supplier due to your position. Before using a SettleParadigm supplier, you should first consider whether by doing it may create or will be perceived to create an obligation to the supplier. If a reasonable person would conclude that the use of a SettleParadigm supplier may create such an obligation, then the supplier should not be used to provide personal services to you. A list of regular suppliers, contractors and consultants used by SettleParadigm is available on request from the Procurement Team.
- You may not receive any payment, grant or loan from SettleParadigm except under the conditions of employment or engagement including those for reimbursement of expenses further to current SettleParadigm procedures and rates. You should not make or receive loans from residents or other members of the Board or staff during the course of your employment or engagement.

Confidentiality

You must process information in accordance with the law and SettleParadigm's policies and procedures.

SettleParadigm holds confidential information about residents, members of the Board and staff and third parties. The confidential nature of personal and commercially sensitive data should be respected.

Staff, Board and committee members are required to comply with the Data Protection Policy for the relevant company by which they are employed or for which they have a contract for services (i.e. Settle Group or Paradigm Housing Group Limited) and the duties of confidentiality contained within contracts of employment or engagement to provide services.

The following is expected of all:

- You must not disclose, without the required permission and authority, any personal data about tenants, residents, staff or colleagues, or relating to the business of third parties.
- You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left SettleParadigm or stepped down from your position.
- You must not, without authority, pass or distribute to the press or media or any other external recipient(s) any unpublished information or materials relating to SettleParadigm, unless you are doing so in accordance with SettleParadigm's Whistleblowing Policy and procedure.
- You must not prevent another person from gaining access to information to which they are entitled to by law.

Where it is essential that information is released outside the Group, it must be with the express written consent of the individual/party concerned, unless SettleParadigm has a legal or regulatory obligation to disclose the confidential data. Should you be unsure of your duties including whether or how to share data, you should contact a senior manager or Executive Director. You remain bound by SettleParadigm's policy on reporting concerns at work and procedures for contacts with the media.

Reporting concerns

You must report to the appropriate person within SettleParadigm any reasonable suspicions you have about possible wrongdoing in line with SettleParadigm's relevant policies and procedures.

The following is expected of all:

- If you have a concern about possible wrongdoing, you must immediately report it via the appropriate internal channel or external body. This includes becoming aware of potentially dishonest or fraudulent activity, and material breaches of this Code or relevant legislation including health and safety.

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

4.3 Conducting yourself professionally and treating each other well

Professionalism, consideration and respect for others, and a commitment to the principles of equality, diversity and inclusion, are fundamental to the delivery of our social purpose.

SettleParadigm is a place where everyone will be respected, valued, and welcomed. Our commitment to Equality, Diversity and Inclusion (ED&I) means we are creating an inclusive workplace where everyone is free to be themselves and feel like they belong.

SettleParadigm will not discriminate on the basis of an employee's protected characteristics i.e., age, disability, race, gender reassignment, marriage and civil partnership, pregnancy and maternity, religion or belief, sex or sexual orientation.

We are committed to creating a customer focused culture ensuring that ED&I is embedded in our service delivery, values, behaviours, policies and procedures.

SettleParadigm values its members of staff and will not tolerate any bullying, harassment, victimisation or any unacceptable behaviour towards any member of staff. All employees are valued and respected as individuals and will be treated in accordance with our corporate values and behaviours.

Members of the Board and staff should be aware of the risk of discrimination in the granting of tenancies, contracts of employment, and contracts for services and follow established procedures when involved with such issues.

SettleParadigm monitors the ethnic origin, gender, age, disability, sexual orientation and religious beliefs of members of the Board and staff, and of households seeking and receiving accommodation. SettleParadigm encourages the supply of this information while acknowledging the right of a person to decline providing it as it aims to ensure it reflects the communities it serves.

Respect for others

You must treat all others with respect and consideration.

The following is expected of all:

- You must treat everyone you meet in the performance of your role with equal respect, care and consideration.
- You must show respect for individuals' chosen identities.
- You must promote, through your own behaviours, an organisational culture that is welcoming, accepting and accommodating to people of all backgrounds, cultures and personal characteristics.
- You must not harass, bully or attempt to intimidate any person, or use threatening or aggressive behaviour or other discriminatory behaviours. You must seek to avoid microaggressions in your speech and behaviour. Microaggressions are defined as comments or actions that are subtly and often indirectly hostile or demeaning to a member of a minority or marginalised group. Microaggressions can be unintentional. Any reported instance of microaggressions will be investigated and heard in line with the provisions in our Disciplinary and/or Grievance Policies
- You must not display materials in the workplace or use language in the performance of your role which other people might reasonably find offensive.
- You must report through appropriate channels any instances of unfair or unequal treatment in the workplace and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and respecting confidentiality.

Working with residents and other customers

You must be professional, respectful, fair and courteous in all your dealings with residents and other residents.

The following is expected of all:

- You must seek and value views from residents and other residents when making decisions that will affect them.
- You must not allow any personal relationship with a resident or other customer to influence how you discharge your role and responsibilities.
- You must not give personal gifts or loans of money to, or receive personal loans or gifts of money from, residents or other residents.
- You must handle residents' and other residents' money only where absolutely necessary and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with SettleParadigm's financial policies, procedures and controls to ensure appropriate handling of any and all funds.
- You must not invite or influence a resident or other customer unless they are a person who you are closely connected to, to make a will or trust under which you are named as executor, trustee or beneficiary.

Relationships with Residents, Tenants, Service Users, Housing Applicants, Local Authority Partner employees and Landlords

Board members and staff should be careful of relationships with residents and not allow any personal relationship to conflict with the best interests of the customer or SettleParadigm.

Should a member of the Board or staff believe that any undue influence or pressure has been or is being applied on them by a customer, this must be promptly notified to a senior manager, Executive Director, or Chair of the Board. This is to protect the member of the Board or staff from any subsequent allegations or suggestions of inappropriate conduct. Any reports of this nature will be treated in confidence.

Under no circumstances must staff be directly involved in situations involving relatives and friends and they must advise their Line Manager as soon as possible of any such situation.

These might include, but may not be limited to:

- Processing of housing applications.
- Providing property maintenance.
- Processing of employment applications.
- Allocation or letting of properties.
- Management of any matter relating to a tenancy agreement.

Members of the Board or staff should take reasonable steps to avoid being compromised by their relationships with residents. The relationship of trust should not be abused and there is a presumption that all relationships should be on a professional basis only and where they are not, the member of the Board or staff is required to notify the Chair of the Board, Group General Counsel, or senior manager as appropriate.

Staff should speak to their Line Manager immediately if they believe that there is a situation or a potential situation where your ability to carry out their work to the required standards may be affected by a personal relationship with someone who is a tenant of the group, who provides services to the group, or who is also employed by the group.

Members of the Board and staff must not invite or influence a customer to make a will or trust under which you are named as executor, trustee or beneficiary. Where the customer is vulnerable the member of the Board or staff must take steps to avoid being named an executor, trustee or beneficiary if or when you become aware or reasonably should have become aware of the vulnerable person's intention to name them as an executor, trustee or beneficiary.

If it is necessary to handle a customer's money and alternative arrangements cannot be put in place through a relative or social services, extreme care must be taken including receipting

every transaction. The same applies to the collection of medical prescriptions for residents and any such arrangements must be noted on the appropriate records.

Under no circumstances can staff be involved in the administration of prescribed drugs.

Members of the Board who in their professional or business capacity come into contact with a customer should be conscious of the potential for conflicts of interests and behave as the situation demands.

Entry into homes

Entry to a customer home will only be at their invitation unless we have a right to enter under the tenancy agreement or licence arrangements. Unlawful entry into a customer's home is trespass and may result in a legal claim for damages against SettleParadigm.

Where we need to enter the property and the resident is not providing access, the correct process is for us to seek an injunction via the court. However, in an emergency situation (for example, where there is a suspicion that a resident is in difficulty or there is immediate danger of damage to a property), staff will need to take a risk-based decision whether to force entry to the property. Ideally, the emergency services should be called to attend the forced entry.

Some residents, in our housing for older people, receive a daily support call. Where a call is not answered by the resident, and the staff member has not been informed of their absence, we will check on the resident by one of the following means – contacting the family and asking them to check on their relative, contacting the emergency services or by a staff member using the master key to the property. We would also use this approach should a resident not respond to contact from the alarm monitoring company, should the resident's alarm system be activated.

Where a resident has a Licence Agreement (as is the case in the Foyer and our shared rented properties), occupants do not have exclusive possession of the property and staff can let themselves into the property if it is reasonable to do so.

Any entry to a resident's home without their invitation must be noted on the individual's tenancy records.

Professional relationships

Board members, staff and residents involved in the governance or other decision-making processes of SettleParadigm, including formal engagement mechanisms, must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.

The following is expected of all:

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

The following is expected of staff members:

- You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding, in a professional setting, inappropriate personal familiarity with Board members and involved residents.
- You must not use informal channels to lobby or influence Board members or involved residents on matters of SettleParadigm's business.
- You must not knowingly mislead the Board or any of SettleParadigm's committees or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.

The following is expected of Board members:

- Your relationships with staff and involved residents must be constructive and professional.
- You must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies and objectives of SettleParadigm.

The following is expected of Board members & involved residents:

- Where it is necessary to raise issues of staff, Board or contractor performance, these must be raised constructively and through the appropriate channels.
- You must not undermine or appear to undermine the authority of a senior officer in his or her dealings with a more junior member of staff.

Learning & development

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

The following is expected of all:

- You must play an active part in SettleParadigm's supervision and performance appraisal processes as applying to you.
- You must offer open and constructive feedback to others and invite feedback about your own performance.
- You must make your personal training and development needs known to SettleParadigm.
- You must maintain professional accreditations or memberships where they are required as an essential element of your role.
- Unless there are exceptional reasons, you must attend learning and development events as required.

The following is expected of board members:

- You must keep your knowledge up to date in those areas in which you are a specialist, as well as keeping abreast of any matters relating to SettleParadigm and the wider housing sector.

4.4 Protecting yourself, others and the environment

You have a responsibility while on SettleParadigm's business to protect your own health, safety, security and wellbeing and that of others, and to minimise harmful environmental impacts.

Health, safety & security

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

The following is expected of all:

- You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk.
- If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or a group of individuals connected with SettleParadigm, you must report this immediately through the appropriate channels.

Protecting the environment

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

The following is expected of all:

- In carrying out actions or making decisions in the performance of your role, you must consider the environmental impact of your decisions and where you are able, seek to achieve positive environmental outcomes.

The following is expected of board members:

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

5. Equality, Diversity & Inclusion

SettleParadigm is a place where everyone will be respected, valued, and welcomed. The Code of Conduct Policy supports a culture of openness and accountability where all staff feel supported, included and a sense of belonging.

The Code of Conduct is in place to ensure that all staff and those they interact with experience the highest standards of conduct, probity and ethics and that we promote a culture that enables and supports individuals to deliver the best possible service for our residents.

6. Roles and responsibilities

Common Board has overall responsibility for this Code of Conduct. They are responsible for ensuring that all Board members and staff can comply with the Code of Conduct, whilst promoting a culture that enables and supports all individuals concerned to meet their responsibilities, as set out in this Code, and deliver the best possible service for residents and residents.

Executive Board are responsible for setting the environment, role modelling the desired values and behaviours and setting clear expectations as to standards required across the organisation in relation to this Code. They are also responsible for ensuring legal and regulatory requirements and our policy commitments are met.

Managers are responsible for role modelling the desired values and behaviours and setting clear expectations as to standards required across their teams in relation to this Code. Also for immediately addressing any actual or potential breaches of this Code, using the various policies and processes in place.

Staff are responsible for ensuring that the principles of this Code are incorporated in their work activities, in all dealings with residents, colleagues and anyone else they come into contact with, in the course of their employment.

7. Compliance/Key Performance Measures

This policy is written, monitored and assessed in line with the NHF Code of Governance.

The Board will ensure that all staff have the ability to access the Code of Conduct Policy via the company intranet.

Declaration of Interest forms for all Board members will be held in a register by the Group General Counsel which may be open to public scrutiny. Reporting is provided within the Governance and Financial Viability Report provided to Common Board annually.

Executive Directors review relevant submissions on all Declaration of Interest forms at least as part of the annual review cycle, and more frequently if required.

The People Team complete an annual review of all Declaration of Interest forms, identifying any risks or anomalies and acting upon them as appropriate. The HR team also monitor and act upon any declarations made by job applicants and/or new staff members, escalating to the

Executive Directors as appropriate. Assurance of staff completing an annual declaration at a minimum and the assurance of acting upon any issues that may, or may be perceived to arise is provided annually to the Executive Director – People, Strategy & Corporate Services.

Individuals' data related to the sections within this Code is held within the People Management & Governance Departments and only shared with relevant senior managers when and if appropriate to do so.

The Hospitality register is held with the Governance Team.

The Policies listed in the Cross References section that support the application of this Code each contain relevant Monitoring/Reporting and Assurance Controls.

8. Related Policies, Procedures and Key Documents

Further information or guidance on the Code, is available to staff (and Board) on SettleParadigm's intranet.

Policy cross-references include:

- Anti-Bribery and Corruption Policy
- Anti-Fraud Policy
- Probity Policy
- Whistleblowing (Speak Up) Policy
- IT User Policy
- Duty of Care – Safeguarding Policy and supporting procedures
- Data Protection Policy
- Equal Opportunities and Dignity at Work Policy
- Equality, Diversity & Inclusion Policy
- Disciplinary Policy
- Board and Committees Grievance Policy
- Grievance Policy – Staff
- Conflicts of Interest Policy
- Gifts & Hospitality Policy
- Declaration of Interest form

9. Version Control

Version control			
Date	Version	Approved By	Details of Amendments
3/11/25	V1	Group Common Board	New integrated policy for SettleParadigm