Code of Conduct

Version Number	2
Date Applies From	30/09/2026
Policy Owner	Director of People
Next Review Date	30/09/2029
Strategy Link	ForHousing Strategy

Key connected legislation/regulation:

- NHF Code of Governance (2020)
- NHF Code of Conduct (2026)
- Competence & Conduct Standard
- Social Housing (Regulation) Act 2023
- See linked documents for pertinent legislation

Annual Checks

Policy owners should ensure that an annual check of hyperlinks, roles, and names is undertaken. These checks are in addition to formal review process. Please see Policy and Procedure framework guidance for further details.

UNCONTROLLED IF PRINTED

If you need this information in an alternative language please call

0161 605 7260

For other formats please call

0300 123 5522

Introduction

The Code of Conduct sets out the standards of behaviour, integrity and professionalism expected of everyone acting on behalf of ForHousing.

This Code adopts and gives effect to the principles contained within the National Housing Federation Code of Conduct 2026 and should be read alongside the NHF Code of Governance, the Competence and Conduct Standard, the Social Housing (Regulation) Act 2023, the National Housing Federation Code of Conduct 2026 and relevant ForHousing policies and procedures.

Scope of the Code

The Code applies to ForHousing colleagues, Board and Committee Members, and Involved Tenants. ForHousing also expects its suppliers, contractors, and sub-contractors to act in a way that demonstrates high standards of conduct and probity and there is a dedicated Supplier Code of Conduct for suppliers, contractors and sub-contractors. Supplier Code of Conduct

The Code is split into five parts:

I. Acting in the best interests of customers and ForHousing
Individuals have a responsibility to carry out their role in a way that supports the long term interests of current and future customers and in line with the purposes and values of the ForHousing.

II. Behaving with Integrity
By integrity, individuals must act honestly, transparently and in line with the highest standards of ethical conduct. The reputation and good name of ForHousing depends on compliance with this Code, and with the laws, policies and procedures to which it refers.

III. Treating others fairly, with respect and empathy
The way in which people behave towards each other is fundamentally important to the experience of customers, and colleagues of ForHousing. Respective, fair and empathetic behaviour is essential to building trust, maintaining effective relationships and supporting a healthy organisational culture.

IV. Taking responsibility for the impact of individuals actions
Individuals have a responsibility while on ForHousing business to consider the immediate and longer term impact of their actions and to be accountable for them.

V. Acting with diligence and care

The diligence and care with which roles are performed has a significant impact upon the quality of decision making and services, and on the experience of customers and staff. This includes taking responsibility for individuals own performance and for meeting relevant professional

Related Legislation and Regulation

ForHousing has adopted the NHF Code of Governance (2020) which requires the Board to adopt a formal Code of Conduct to which all its Members adhere. The Code of Conduct relates to the Competence & Conduct Standard which comes from the Social Housing (Regulation) Act 2023. Relevant legislation and regulatory requirements are referenced within the associated documents and should be considered alongside this document.

Definitions

ForHousing refers to ForHousing Limited, and its subsidiary companies.

Board and Committee Members refers to all non-executive directors, co-opted and independent members of the ForHousing Board and its Committees and the Boards of its subsidiary companies.

Involved Tenants refers to customers that are involved in any activity in connection with a formally constituted meeting or group convened by ForHousing, i.e. Scrutiny Group, Service Excellence Groups, Community Voice, etc.

Colleagues refers to ForHousing employed colleagues and it includes temporary workers, volunteers, agency workers and work experience placements.

Tenant Colleagues refers to colleagues who are also tenants and/or occupants of ForHousing properties. See Tenant Colleague guidance.

Probity means acting ethically with decency and honesty.

Connected to ForHousing refers to Board and Committee Members, colleagues, Involved Tenants and customers of ForHousing, friends, contractors, sub-contractors and other third-party companies that provide services to ForHousing, such as solicitors, architects, builders, etc.

Relative / related refers to a person connected by blood or marriage and / or cohabitation, civil partnership, or dependents. The definition under s.272 Housing and Regeneration Act 2008 shall apply.

Personal relationship refers to any interpersonal relationship that develops that could directly affect a colleague's performance and/or ability to carry out their work or could cause reputational, emotional, or physical harm.

How to Stay up to Date with this Code

All colleagues, Board and Committee Members and Involved Tenants receive training in relation to the Code of Conduct when they join ForHousing as part of the induction process.

Ensuring high standards of conduct and probity is important and so there is mandatory governance training every two years to ensure that colleagues remain up to date and understand what is expected of them. A reminder of the expectation of adherence to this Code is issued annually and dovetails with the annual review of declarations of interest.

Culture and Values

This section outlines the behaviours and standards, along with the related policies, that will be upheld by ForHousing and are expected of colleagues, Board and Committee Members, and Involved Tenants. They reflect our LIVEIT Behavioural framework and our HEART values which are at the core of the organisation and demonstrate a working culture based on **respect**, **trust**, **openness**, and **passion**.

This section also outlines behaviours that are considered unacceptable and at odds with ForHousing's ethos.

ForHousing will:

- Promote standards to ensure the conduct of colleagues, Board and Committee Members and Involved Tenants at meetings, events, and in the workplace, demonstrates respect for all, and promotes the values of ForHousing.
- Ensure that the expected standards of behaviour and conduct for colleagues, Board and Committee Members and Involved Tenants are clearly set out in their terms of appointment and form part of induction training.
- Use reasonable endeavours to ensure that contractors directly involved in delivering ForHousing's business activities are obliged to comply with ForHousing's relevant policies, procedures and supplier code of conduct.
- Encourage those with serious concerns about any aspect of their work to come forward and express those concerns and will comply with appropriate policies and procedures for handling any such concerns: Whistleblowing Policy and Speak Up Arrangements.

All Colleagues, Board and Committee Members and Involved Tenants must:

- Fulfil their obligations responsibly, always acting in good faith and in the best interests of ForHousing, its customers and other service users, maintaining high standards of professionalism at all times.
- Respect the appropriate channels for handling ForHousing's business, including service provision issues and not use their position to gain personal advantage.
- Respect the principle of collective decision-making and corporate responsibility. Board and Committee Members are expected to support the lawful decisions of the Board once made, whilst retaining their individual duties to act in the best interests of ForHousing and their right and responsibility to raise concerns through appropriate governance, regulatory, whistleblowing or legal channels.

- Handle personal data in accordance with data protection legislation and not disclose, without authority, any confidential business information.
- Comply with the law, terms of appointment and ForHousing's policies and procedures.
- Comply with the Procurement Policy when producing goods and services on behalf of ForHousing.
- Abide by the Social Media Guidelines.
- Ensure that the use of ICT equipment is in line with the ICT Acceptable Use Policy expectations.
- Refrain from bringing ForHousing's name into disrepute or affect its integrity by their actions or words, either within ForHousing or outside, failure to act accordingly may result in disciplinary action or dismissal. This includes, but is not limited to:
    - Illegal, immoral, racist, or other discriminatory activity.
    - Making offensive comments, this includes written and spoken.
    - Engaging in any political or campaigning activity that might compromise the position of ForHousing.
    - Theft from ForHousing, members, or colleagues or the public.
    - Fraud or other incidences of dishonesty.
    - Falsification of records, reports, accounts, expense claims or self-certification forms, whether or not for personal gain.
    - Verbal or physical assault.
    - Serious or deliberate damage to or misuse of ForHousing property.
    - Drunkenness or being under the influence of illegal drugs on ForHousing premises or whilst on ForHousing business.
    - Consuming alcohol on work premises.
    - Possession, custody, or control of illegal drugs on ForHousing premises or whilst on ForHousing business.
    - Smoking, vaping, or use of e-cigarettes during meetings, including internal and external meetings. Smoking is only permitted in designated smoking areas.
    - Causing loss, damage, or injury to others through serious negligence
    - Failing to disclose criminal convictions or other information where disclosure is lawfully required by ForHousing, having regard to the Rehabilitation of Offenders Act 1974 and any applicable exceptions.
    - Bullying, harassment and discrimination.
    - Breach of confidentiality.
    - Behaving in such a way as to risk the health or safety of any of our customers, visitors, colleagues, or Board and Committee Members.

- All meetings should be conducted in a professional, respectful and constructive manner with the Chair presiding over the proceedings. Abusive language, racist or sexist remarks or disruptive behavior must never be used. Abuse of colleagues, Board members and invited participants will not be tolerated.

Conduct At Social Events

Where a social event can be classed as an extension of work away from the workplace i.e. Conference, leaving party or training event, the Code of Conduct applies. Those attending such events must:

- Ensure that the Dignity at Work policy applies.

- Colleagues should not say or do anything which may offend, intimidate, embarrass or upset another.
- Offensive, abusive, discriminatory, threatening or otherwise inappropriate language or behaviour will not be tolerated. The seriousness of any breach will be assessed having regard to the circumstances and applicable People policies.
- Not act in any way which discredits themselves or ForHousing.

Part I: Acting in the Best Interests of Customers and ForHousing

A. Meeting Individual Responsibilities

The Principle

Individuals must act in good faith, putting aside personal gain and making decisions that support the long term interests of customers as a whole and are in the best interests of ForHousing.

ForHousing will:

- Place customers at the heart of decision-making.
- Seek and value customer views when developing services.
- Promote meaningful customer influence and scrutiny.
- Learn from complaints, scrutiny and customer feedback.
- Consider the long-term interests of current and future customers.

All Colleagues, Board and Committee Members and Involved Tenants must:

- Act in good faith and in the best interests of customers and ForHousing.
- Support ForHousing's strategic objectives and values.
- Consider the impact of actions and decisions on customer safety, wellbeing and service outcomes.
- Listen to and appropriately consider customer feedback.
- Avoid actions that unfairly favour particular individuals or groups.
- Treat customers fairly and consistently.
- Challenge stigma associated with social housing and customers.
- Respect collective decisions once properly taken through governance arrangements.

B. Representing ForHousing

The Principle

When representing ForHousing in any capacity, including at external events, in dealings with outside bodies and on social media, individuals are ambassadors for ForHousing and must uphold and promote its values, objectives and policies.

All individuals representing ForHousing:

- Must act professionally and in accordance with ForHousing's values.
- Must not bring ForHousing into disrepute.
- Must not make false, misleading or malicious statements.
- Must not imply they are speaking on behalf of ForHousing unless authorised.
- Must ensure any social media activity referencing their role clearly distinguishes personal opinion from organisational positions.

Activities Outside of Work

Individuals must:

- Obtain appropriate approval before undertaking external employment or voluntary activities that may conflict with their role.
- Declare political appointments, directorships, trusteeships or governance positions.
- Ensure outside interests do not interfere with their responsibilities to ForHousing.
- Seek approval before undertaking activities that could reasonably be perceived as affecting ForHousing's reputation.

Part II: Behaving with Integrity

Integrity means that individuals must act honestly, transparently and in line with the highest standards of ethical conduct. The reputation and good name of ForHousing depends on compliance with this Code and the laws, policies and procedures to which its refers.

C. Conflicts of Interest

The Principle

Individuals must take all reasonable steps to make sure that no conflict arises, or could reasonable be perceived to arise, between ForHousing duties and personal interests, other duties and relationships.

Transparency and Integrity

All individuals must:

- Act honestly, transparently and ethically at all times.
- Avoid using their position for personal gain or advantage.
- Use organisational resources responsibly and only for legitimate purposes.
- Be open about actual, potential or perceived conflicts of interest.
- Raise concerns regarding unethical behaviour, fraud, corruption or misconduct.

Declarations of Interest

Individuals must:

- Declare any interests, roles, relationships or circumstances that may create a conflict of interest.
- Maintain accurate declarations throughout the year.
- Declare conflicts arising during meetings even where recorded in a register.
- Withdraw from discussions or decisions where a significant conflict exists.
- Avoid involvement in decisions affecting relatives, close connections, customers, contractors or suppliers with whom they have a relationship.

Interpersonal Connections

Individuals must not:

- Provide preferential treatment to relatives, friends or close associates.
- Participate in recruitment, procurement or contractual decisions involving connected persons.

- Allow personal relationships to influence decision making.

Individuals must:

- Maintain appropriate professional boundaries.
- Declare relationships that may affect or be perceived to affect impartiality.
- Avoid inappropriate familiarity with customers, Board Members, colleagues and contractors.

D. Bribery, Gifts and Hospitality

The Principle

In their roles with ForHousing, individuals must not allow gifts, hospitality or other benefits to influence, or be perceived to influence, their judgement or behaviour.

Use of Contractors and Suppliers

All individuals must:

- Comply with procurement requirements.
- Ensure procurement decisions are fair and transparent.
- Avoid using contractors or suppliers connected to ForHousing for private benefit unless approved and declared.
- Never use their position to secure favourable treatment from suppliers or contractors.

Gifts and Hospitality

All individuals must:

- Refuse bribes, inducements and improper incentives.
- Declare gifts and hospitality in accordance with organisational procedures.
- Avoid accepting benefits that might influence, or be perceived to influence, decision-making.
- Never seek gifts, hospitality or preferential treatment because of their role.
- Never accept personal bequests from customers or customers.

Confidentiality

All individuals must:

- Protect personal data and confidential information.
- Comply with data protection legislation and internal policies.
- Not disclose confidential information without authority.
- Continue to respect confidentiality obligations after leaving their role.
- Support transparency where information should lawfully be disclosed.

Working with Customers

All individuals must:

- Act fairly and respectfully toward customers.
- Maintain professional boundaries.
- Not allow personal relationships to influence service provision.
- Not give or receive personal loans from customers.
- Not influence customers for personal benefit.
- Seek and value customer insight and feedback.

E. Funds, Resources and Personal Benefit

The Principle

Individuals must use ForHousing's funds, resources and assets responsibly, transparently and only for proper purposes.

All Colleagues, Board and Committee Members and Involved Tenants must:

- Ensure that organisational resources are used efficiently and in support of ForHousing's objectives.
- Comply with procurement, financial and expenses procedures at all times.
- Take reasonable steps to protect organisational assets, equipment, information and funds from loss, damage, fraud, theft or misuse.
- Ensure that any expenditure incurred on behalf of ForHousing is reasonable, necessary and appropriately authorised.
- Act at all times in a manner that represents value for money and appropriate stewardship of resources.

F. Confidentiality

The Principle

Individuals entrusted with information through their role must handle it responsibly, lawfully and ethically. This includes balancing confidentiality, data protection requirements, transparency obligations and the need to protect commercially sensitive information.

All Colleagues, Board and Committee Members and Involved Tenants must:

- Protect personal data and confidential information obtained through their role.
- Comply with data protection legislation and organisational policies relating to information governance and cybersecurity.
- Not disclose confidential, sensitive or commercially privileged information without appropriate authority.
- Continue to uphold confidentiality obligations after leaving their role with ForHousing.
- Support openness and transparency where information should lawfully be shared or disclosed.

G. Working with Customers

The Principle

Individuals must act fairly and properly in their dealings with residents, including listening to residents' views and being accountable for their actions.

All Colleagues, Board and Committee Members and Involved Tenants:

- Individuals must seek and value views from customers when making decisions that will affect them.
- Individuals must not allow any personal relationship with a resident to influence how they discharge their roles and responsibilities.
- Individuals must not give personal gifts or loans of money to, or receive personal loans or gifts of money from customers.

- Individuals must handle customers' money only where absolutely necessary and ensure that a receipt is completed for every transaction. In any event, individuals must operate in accordance with ForHousing's financial regulations and procedures.
- Individuals must not invite or influence a resident to make a will or trust under which they are named as executor, trustee or beneficiary.

H. Reporting Concerns and Speaking Up

The Principle

Individuals have a responsibility to speak up where they become aware of behaviour, decisions or actions that may be unlawful, unethical, unsafe or inconsistent with this Code. Raising concerns in good faith supports a culture of openness, accountability and continuous improvement.

All Colleagues, Board and Committee Members and Involved Tenants must:

- Promptly report concerns relating to misconduct, fraud, corruption, breaches of law, breaches of this Code or significant health and safety risks
- Raise concerns through the appropriate internal or external channels, including whistleblowing arrangements where appropriate.
- Support a culture where individuals feel able to speak up and raise concerns without fear of reprisal.
- Never victimise, disadvantage or treat unfairly any person who raises a concern in good faith.

Part III: Treating Others Fairly, with Respect and Empathy

I. Fairness, Respect and Empathy

The Principle

Individuals must treat all others with fairness, respect and empathy, regardless of role, status or circumstances. Individuals must recognise where they have power and authority in their roles and use this in a way that is responsible and, where possible, empowers other people.

Culture and Values

ForHousing expects a culture built upon:

- Respect
- Passion
- Trust
- Openness
- Accountability
- Inclusion
- Professionalism
- Customer focus

All individuals must:

- Treat others with courtesy, dignity and empathy.
- Contribute positively to organisational culture.

- Welcome constructive challenge and differing perspectives.
- Behave professionally at meetings, events and social functions connected with work.
- Challenge language and behaviour that stigmatises customers or social housing.

J. Professional Relationships

The Principle

Board members, staff and involved customers must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles.

Professional Relationships

All individuals must:

- Maintain professional relationships and boundaries.
- Not seek to influence governance decisions through inappropriate informal channels.
- Raise concerns about performance through appropriate processes.
- Respect the roles and responsibilities of others.
- Not knowingly mislead colleagues, committees or Boards.

Equity, Diversity and Inclusion

ForHousing is committed to creating an inclusive environment where everyone is treated fairly and with respect.

All individuals must:

- Respect protected characteristics and lived experiences.
- Avoid assumptions or discriminatory behaviour.
- Promote equality of opportunity.
- Challenge bullying, harassment and discrimination.
- Support reasonable adjustments where appropriate.
- Contribute to an environment where people feel safe to raise concerns and express views.

Part IV: Taking Responsibility for the Impact of Individual Actions

K. Customer Experience

The Principle

Individuals must anticipate and take responsibility for the impact that conduct, actions and decisions may have on customers.

All individuals must:

- Consider how actions and decisions affect customers.
- Be able to explain decisions clearly.
- Respond constructively to feedback.
- Learn from complaints and customer insight.

L. Health, Safety and Wellbeing

The Principle

Individuals' conduct, actions and decision making must promote their own health, safety, security and wellbeing and that of others.

All individuals must:

- Promote health, safety and wellbeing.
- Avoid actions that place others at risk.
- Escalate concerns promptly.
- Consider safety in all decision-making activities.

M. Environment and Sustainability

The Principle

Individuals must consider and try to avoid or reduce negative impacts on the environment and sustainability.

All individuals must:

- Consider environmental impacts when making decisions.
- Use resources responsibly.
- Reduce waste wherever practicable.
- Support sustainability objectives and environmental improvement initiatives.
- Seek positive environmental outcomes where possible

N. Digital and Data

The Principle

Individuals must ensure that use of digital systems, data and emerging technologies is responsible and protects customers, staff and ForHousing from harm.

All individuals must:

- Protect sensitive information and digital assets.
- Use systems and technology responsibly.
- Report cyber security incidents and suspected data breaches immediately.
- Ensure digital technology is used lawfully, ethically and transparently.
- Take care when using artificial intelligence and ensure human accountability remains in decision making.

Part V: Acting with Diligence and Care

O. Learning and Development

The Principle

In partnership with ForHousing, individuals must take responsibility for their own learning and development, maintaining the skills, knowledge and regulatory awareness required to perform

their roles effectively.

All individuals must:

- Take responsibility for maintaining competence.
- Complete mandatory learning.
- Participate in relevant development activities.
- Apply learning within their role.

Board and Committee Members should maintain current knowledge of governance, regulation and sector developments.

Colleagues with professional qualifications must maintain professional standards and continuing professional development requirements.

P. Acting with Care and Diligence

The Principle

Individuals must act with care and diligence in making sure that they understand their roles and requirements, and that they are equipped to carry out their duties.

All individuals must:

- Understand the requirements of their role.
- Prepare appropriately for meetings and decision-making.
- Escalate issues, risks and concerns promptly.
- Avoid ignoring, concealing or minimising significant issues.
- Exercise sound judgment and accountability.

Q. Continuous Improvement

The Principle

Individuals must support a culture of learning and continuous improvement through acting in an open and accountable manner, recognising mistakes and learning from feedback to help ForHousing to continue to improve outcomes.

ForHousing is committed to learning and continuous improvement.

All individuals must:

- Learn from complaints, feedback, incidents, audits and scrutiny.
- Be open to challenge and new learning.
- Provide constructive feedback respectfully.
- Share good practice and lessons learned.
- Acknowledge mistakes and support corrective action.
- Contribute to service improvement and better outcomes for customers.

Non-Compliance

Failure to comply with this Code may result in disciplinary action, removal from governance roles, cessation of involvement activities, referral to professional bodies, referral to regulators

or other appropriate action.

Breaches of the Code will be investigated fairly, proportionately and in accordance with relevant ForHousing policies and procedures.

Equity, Diversity, and Inclusion

ForHousing values diversity and works to create an inclusive environment for its customers and colleagues, where everyone has access to the same opportunities. ForHousing welcomes its responsibility to comply with equalities legislation and regulatory requirements that relate to equity, diversity and inclusion and aims to do more. Through its activities, ForHousing aims to remove systemic barriers to equal opportunities and eliminate all forms of discrimination, harassment, and victimisation within the organisation.

ForHousing is committed to providing excellent customer services, which are fair, equitable and inclusive. As such, ForHousing will endeavour to understand and make any reasonable adjustments required for customers in line with ForHousing's Reasonable Adjustment Statement and the Equality Act 2010.Any reasonable adjustment provided will be recorded and kept under active review.

Implementation and Communication

The Code of Conduct is available to all parties via the company website and colleague intranet. Training on the Code of Conduct is provided and incorporated into our colleague induction.

Related Documents

- Gifts and Hospitality Guidance
- Tenant Colleague Guidance
- Supplier Code of Conduct
- Conflict of Interest Guidance
- Office Protocol Guidance
- Use of Social Media Guidance
- Home Visits Guidance
- Anti-Fraud, Anti-Corruption and Anti-Bribery Policy
- Anti Money Laundering Policy
- Whistleblowing Policy & Speak Up Arrangements
- STAIRs Policy
- NHF Code of Governance (2020)
- NHF Code of Conduct (2026)
- Procurement Policy
- ICT Acceptable Use Policy
- Raise a concern
- Disciplinary Procedure
- LIVEIT Framework
- EDI Policy
- Outside Employment Authorisation Form *(under development)*

Co-production

The People Team, Governance Team, & People Policy Working Group have been involved with updating and reviewing this document to ensure it is compliant and up to date.

Approval & Review History

The approval route for the Code of Conduct is: EMT - PACC - Board

Date	Version	Approved by	Detail
18/10/24	V1	Board	New Code of Conduct. (EMT 09/22 / PACC 17/09/24)
30/09/26	V2	Board	Refreshed Code of Conduct and associated documents. (EMT 13/08/26 / PACC 03/09/26)