

Bromford Flagship LiveWest's Code of Conduct

Our Code for Board¹ and Committee members, colleagues and involved customers

¹References to the Board in this document are as defined in the Governance Framework as the coterminous board acting as the board of each Group RP entity.

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Introduction

Bromford Flagship LiveWest's Code of Conduct is in line with the National Housing Federation's Code of Conduct. It is a summary of the principles and standards of conduct we expect of our Bromford Flagship LiveWest Board and Committee members, colleagues and involved customers. It is supplemented by and should be read alongside the Probity and Conduct Standards in place across the Group.

It is vital to the reputation of Bromford Flagship LiveWest and social housing that everyone who works for or represents a housing association is held to the highest standards of conduct.

By following the Code and demonstrating Bromford Flagship LiveWest's values in our everyday work, everyone will help to realise Bromford Flagship LiveWest's vision.

1. Acting in the best interests of Bromford Flagship LiveWest and our customers

You and your colleagues all have a responsibility to complete your role in line with the purposes and values of Bromford Flagship LiveWest.

A. Meeting your responsibilities

The principle

You must fulfil your duties and obligations responsibly, acting at all times in line with our values and behaviours, as well as in the best interests of Bromford Flagship LiveWest and the delivery of our strategic objectives.

Expected of all

- A1 You must always try to fulfil the requirements of your role to the best of your ability. If any circumstances limit your ability to meet your responsibilities, you must raise this with your manager.
- A2 In carrying out your role, you must always seek to support our strategic objectives, reflecting our desired culture.
- A3 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.

- A4 You must consider the impact of your actions on the safety and wellbeing of customers.

Expected of Board members

- A5 You must respect the principle of collective decision-making and corporate responsibility.
- A6 You must ensure you declare to Bromford Flagship LiveWest 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.

Expected of colleagues

- A7 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.

B. Representing Bromford Flagship LiveWest

The principle

In representing Bromford Flagship LiveWest in any capacity, you are an ambassador for the business and must uphold and promote our values, objectives and policies. This includes at external events, dealing with outside bodies and on social media.

Expected of all

- B1 In representing Bromford Flagship LiveWest, you must act in line with our values, behaviours, policies and goals.
- B2 You must not conduct yourself in a manner that could reasonably be regarded as bringing Bromford Flagship LiveWest into disrepute.
- B3 You must not make derogatory, false or otherwise damaging comments, in person or through any medium, about Bromford Flagship LiveWest or any person, service or organisation connected with us.
- B4 You must not seek to officially represent the views or position of Bromford Flagship LiveWest without prior authority.
- B5 You must adhere to our policies/procedures in the use of email, internal channels (such as our intranet pages) and internet services, including social media.
- B6 When representing Bromford Flagship LiveWest through any medium, including social media, you must at all times act with professionalism.

- B7 Where any personal social media accounts refer to your role with Bromford Flagship LiveWest you must make it clear in what capacity you are communicating.
- B8 If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect Bromford Flagship LiveWest, you must declare your involvement and must ensure your activity does not pose a material risk to the association.

Expected of Board members

- B9 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.

2. Behaving with integrity

The reputation of Bromford Flagship LiveWest depends on compliance with this Code, and with the laws, policies and procedures that it refers to.

C. Conflicts of interests

The principle

You must take all reasonable steps to make sure no conflict arises, or could reasonably be perceived to arise, between your duties to Bromford Flagship LiveWest and your personal interests, other duties and relationships.

Expected of all

- C1 You must formally declare to Bromford Flagship LiveWest, at the earliest opportunity, any interests which may, may perceive to or may in the future, conflict with the duties of your role.
- C2 You must declare any known relationship to a person applying for or performing a role within Bromford Flagship LiveWest and must not be involved in their appointment, performance management or reward.
- C3 You must declare any known relationship to a resident, potential resident or other customer of the association. You must not be involved in decisions relating to their relationship with Bromford Flagship LiveWest or seek or accept preferential treatment for them.

- C4 You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to the association and must not be involved in their appointment, performance management or reward.
- C5 Bromford Flagship LiveWest colleagues are permitted to use Bromford Flagship LiveWest contractors for private goods or work in their own homes. This is provided the work will be undertaken or was undertaken under the contractor's standard commercial terms and that no financial or other advantage was gained by you or the contractor, unless under an approved discount scheme offered by Bromford Flagship LiveWest.
- C6 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.

Expected of Board members

- C7 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.

D. Bribery, gifts and hospitality

The principle

In your role with Bromford Flagship LiveWest, you must not offer, seek or accept bribes or incentives 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.

Expected of all

- D1 You must not ask for or seek gifts or hospitality or other benefits.
- D2 Any gifts or hospitality offered to or by you must be either declared or declined according to our policies and/or procedures.
- D3 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.

E. Funds, resources and personal benefit

The principle

You must not misuse Bromford Flagship LiveWest's funds or resources, or seek preferential treatment for your own personal benefit.

Expected of all

- E1 You must ensure Bromford Flagship LiveWest's funds and resources are used properly and efficiently.
- E2 Your procurement decisions must be guided by Bromford Flagship LiveWest's policies and fairness in decision-making and in line with relevant law.
- E3 You must take all reasonable measures to protect Bromford Flagship LiveWest's funds, resources, property and assets from fraud, theft, damage and misuse.
- E4 If you claim reimbursement for any expenses you must do so in line with Bromford Flagship LiveWest's policies and procedures.

F. Confidentiality

The principle

You must process information in accordance with the law and Bromford Flagship LiveWest's policies and procedures.

Expected of all

- F1 You must not disclose, without the required permission and authority, any personal data about customers or colleagues.
- F2 You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left Bromford Flagship LiveWest or stepped down from your position.
- F3 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 Bromford Flagship LiveWest, unless you are doing so in accordance with Bromford Flagship LiveWest's whistleblowing policies and procedures.
- F4 You must not prevent another person from gaining access to information to which they are entitled to by law.

G. Reporting concerns

The principle

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

Expected of all

- G1 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.
- G2 If you believe 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.
- G3 You must not victimise or disadvantage any person who uses or intends to use our confidential reporting (whistleblowing) procedures to report actual or alleged wrongdoing.

3. Conducting yourself professionally and treating others well

The reputation of Bromford Flagship LiveWest depends on compliance with this Code, and with the laws, policies and procedures that it refers to.

H. Respect for others

The principle

You must treat all others with respect and consideration.

Expected of all

- H1 You must treat everyone you meet in the performance of your role with equal respect, care and consideration.
- H2 You must show respect for individuals' chosen identities.
- H3 You must promote, through your own behaviours, our organisational culture that is welcoming, accepting and accommodating to people of all backgrounds, cultures and personal and protected characteristics.

- H4 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.
- H5 You must not display materials in your workplace or use language in the performance of your role which other people might reasonably find offensive.
- H6 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.

I. Working with customers

The principle

You must be professional, fair and courteous in all your dealings with customers.

Expected of all

- I1 You must seek and value views from customers when making decisions that will affect them.
- I2 You must not allow any personal relationship with a customer to influence how you discharge your role and responsibilities.
- I3 You must not give personal gifts or loans of money to, or receive personal loans or gifts of money from customers.
- I4 You must not handle customers' money unless where absolutely necessary, and in exceptional circumstances, in which case you must ensure a receipt is completed for every transaction. In any event, you must operate in accordance with Bromford Flagship LiveWest's financial policies, procedures and controls to ensure appropriate handling of any and all funds.
- I5 You must not invite or influence a 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.

J. Professional relationships

The principle

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

Expected of all

- J1 You must not ask or encourage the commitment of wrongdoing, including any breach of this Code.

Expected of Board members

- J2 Your relationships with colleagues and involved customers must be constructive and professional.
- J3 You must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, behaviours, policies and objectives of Bromford Flagship LiveWest.
- J4 Where it is necessary to raise issues of colleague, board or contractor performance, these must be raised constructively and through the appropriate channels.
- J5 You must not undermine or appear to undermine the authority of a senior officer in their dealings with a more junior colleague.
- J6 You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with colleagues.
- J7 Unless you have specific and, where practical, written delegated authority to do so, you must not individually give instruction or direction to any colleague or contractor.

Expected of colleagues

- J8 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 customers.
- J9 You must not use informal channels to lobby or influence board members or involved customers on matters of Bromford Flagship LiveWest's business.
- J10 You must not knowingly mislead the Board or any of Bromford Flagship LiveWest's Committees or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.

K. Learning and development

The principle

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

Expected of all

- K1 You must play an active part in Bromford Flagship LiveWest's supervision and performance appraisal processes as it applies to you.
- K2 You must offer open and constructive feedback to others and invite feedback about your own performance.
- K3 You must make your personal training and development needs relevant to your role known to Bromford Flagship LiveWest.

Expected of Board members

- K4 You must keep your knowledge up to date in those areas in which you are a specialist, as well as any matters relating to Bromford Flagship LiveWest and the wider housing sector.

4. Protecting yourself, other people and the environment

You have a responsibility while working in your role to protect your own health, safety, security and wellbeing and that of others, and to minimise harmful environmental impacts.

L. Health, safety and security

The principle

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

Expected of all

- L1 You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk.
- L2 If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or a group of individuals connected with Bromford Flagship LiveWest, you must report this immediately through the appropriate channels.

M. Protecting the environment

The principle

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

Expected of all

M1 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.

Expected of Board members

M2 You should consider the long term environmental impact of your decisions.

Version Control

Note: minor updates approved by delegated authority increase version number by 0.1; major updates and formally approved versions increase version number by 1.0.

Version	Detail	Approved by	Date
1.0	First issue	Audit and Risk Committee	February 2026



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