



**CODE OF CONDUCT FOR GOVERNING BOARD MEMBERS AND
INVOLVED CUSTOMERS**

FULL REVIEW TRACKING

A “Full Review” refers to a point when a the whole document is reconsidered by appropriate stakeholder to establish if it is still fit for purpose and this is formally signed-off at the appropriate management level. This acts as assurance the Association’s position on key matters is up to date with legislation, regulation and good practice.

Policy Owner	Keith Anderson, CEO
Document Author(s)	Keith Anderson, CEO
Communication & Training Methods	As part of induction this Code is highlighted to all Governing Board Members and involved customers, and who are required to provide their signed agreement to it every year.
Approved By	Boards
Review Cycle	3 years
Next Review Date	July 2020
The Policy has a direct link to the following PoLHA policies and procedures	<ul style="list-style-type: none"> • Board Member Learning and Development Management Policy and Procedures • Openness, Confidentiality and Freedom of Information Policy • Entitlements, Benefits and Payments Management Policy • Procurement Policy
This policy complies with the requirements of these legal and/or regulatory documents	“The Regulatory Standards of Governance and Financial Management”, Regulation of Social Housing in Scotland Framework published by the Scottish Housing Regulator, May 2012.
Equality & Diversity Impact (EI) Assessment Status	<p>This document was EDI Assessed by Keith Anderson and Heather Kiteley using the organisation’s set procedure in July 2017 and is considered to be free of anything which may lead to any unfair discrimination in its application.</p> <p>EI Assessment records are held by the Chief Executive’s Office and can be accessed on request to the Head of Corporate Services.</p>

REVISION TRACKING

Revisions are minor changes which are made between Full Reviews which might be needed because of new ideas or changes

Revision Date	Part of doc revised	Reason for revision	Approved by

1. INTRODUCTION

- 1.1 Port of Leith Housing Association (PoLHA) and its subsidiary companies Persevere Developments Limited (PDL) and Quay Community Improvements (QCI) [hereinafter referred to in this Code as “the Boards”] insists on honesty, integrity and fairness in all aspects of its business and expects the same in its relationships with all those with whom it does business. This Code of Conduct defines the conduct required of all individuals acting as Board Members and as “involved customers” in the delivery of the business.
- 1.2 This Code provides guidance on how to ensure that your actions and behaviour are consistent with the Association’s values and the high standards of conduct required to maintain confidence in the Association and its work.
- 1.3 You must familiarise yourself with the contents of this Code and act in accordance with its principles and provisions at all times. Failure to comply with the code may lead to a governance disciplinary issue.
- 1.4 Board Members and involved customers must avoid conflicts of interest between their private activities and their part in the conduct of the Boards’ business. Board Members and involved customers must also declare any potential conflicts of interest.
- 1.5 All business transactions on behalf of the Boards must be reflected accurately and fairly in the accounts of the Boards in accordance with established procedures and are subject to audit and disclosure.
- 1.6 The Boards act in a socially responsible manner within the law in pursuit of their legitimate objectives. The Boards do not make payments to political parties, organisations or their representatives or take part in party politics.
- 1.7 Attention is drawn in particular to the definition given of ‘involved customer’. For the purposes of this Code an “involved customer” includes tenants of the Association and/or its subsidiary or other service user including shared owner who are involved in delivering or scrutinising the business activities, including members of standing committees such as scrutiny panels and members of ad hoc panels convened to assist in, for example, the selection of contractors, determining the allocation of resources or resolving complaints or appeals from other residents. It does not include – as they are covered elsewhere - tenants or other service users who are also members of the Association’s governing body. The Company Secretary and Directors will determine who is an ‘involved customer’ for the purposes of the Code.
- 1.8 If Board Members or involved customers have any doubts or questions regarding the application of the Code, or in relation to a specific issue, they should seek guidance from the Company Secretary.

2. MAIN PRINCIPLES OF THE CODE

- A **General responsibilities:** You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of the Boards, their customers and other service users.
- B **Conflicts of interests:** You must take all reasonable steps to ensure that no undeclared conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise.
- C **Bribery and/or corruption:** You must not offer, seek or accept bribes or inducements to act improperly or corruptly.
- D **Gifts and hospitality:** 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.
- E **Funds and resources:** You must not misuse the Boards' funds or resources.
- F **Confidentiality:** You must handle information in accordance with the law and the Boards' policies and procedures.
- G **Respect for others:** You must treat others with respect at all times.
- H **Relationship between Board Members and involved customers:** Board Members and involved customers must maintain a constructive, professional relationship based on a sound understanding of their respective roles.
- I **Relationship with customers and other service users:** You must maintain high standards of professionalism, fairness and courtesy in all your dealings with customers and other service users.
- J **Health, safety and security:** Your conduct must not endanger the health, safety or security of yourself or others.
- K **Conduct at meetings:** Your conduct at Board and other meetings must meet a high standard of integrity, commitment and courtesy.
- L **Representing the Boards:** In representing the Boards at external events and in dealings with outside bodies, you must uphold and promote the Boards' values, objectives and policies.
- M **Learning and development:** In partnership with the Boards, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.
- N **Reporting concerns:** You must report any reasonable and honest suspicions you may have about possible wrongdoing.
- O **Dealing with government officials:** The offering of gifts and hospitality including travel-related expenses for government officials creates special

concerns. You must seek permission before doing so.

- P **Benefits from discounts:** Except with advanced permission, no Board Member is to gain any special advantage by virtue of their work with the Boards.
- Q **Promotional materials:** The Boards will from time to time decide to produce promotional material and may make such materials available to Board Members.
- R **Sponsorship:** The Boards may from time to time decide to sponsor a local club or team, or give prizes for local events or competitions.
- S **Money laundering:** You must not become involved in money laundering and must report any suspicious transactions or incidents.
- T **Political activity:** You must ensure your personal political activities are not represented to be those of the Boards.
- U **Action to deal with a breach:** If, following investigation, a breach of this code is confirmed, action will be taken in response.

A **GENERAL RESPONSIBILITIES**

Main Principle

You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of the Boards, its customers and other service users.

Provisions

- A1 You must comply with the law, your terms of appointment and the Boards' policies and procedures relating to your role.
- A2 You must not conduct yourself in a manner which could reasonably be regarded as bringing the Boards into disrepute. This includes membership of, or active participation in, organisations whose values are inconsistent with the Boards' (for instance racist organisations) which could create reasonable doubt in your ability to comply with the Boards' values and this Code.
- A3 You must not bring the Boards' name into disrepute or affect its integrity by your actions or words, either within the organisation or outside. This includes the use of, or entries on, social networking sites (such as Facebook, Twitter, YouTube and others).

This includes making derogatory comments about the Boards, Board Members, customers or other service users, staff, partners or services, either in person or in writing or via any web-based media such as a personal blog or other site. This also applies if you do not name the Boards but where its identity can reasonably be inferred, or where you use a pseudonym but your identity can reasonably be inferred.

If you have a genuine concern about possible wrongdoing, you must report it to the appropriate senior person within the organisation (see section N below).

- A4 You must not act in a way that unjustifiably favours or discriminates against particular individuals, the Boards or their interests.
- A5 You must adhere to the appropriate channels for handling tenancy and service provision issues. You must not act outside the Boards' established procedures in any matter concerning any customer or other service user.
- A6 You must not misuse your position, for example by using information acquired in the course of your duties for your private interests or those of others.
- A7 You must respect the principle of collective decision making and corporate responsibility. This means that once the Boards have made a decision in good faith you must accept that decision.
- A8 You must not engage in any political or campaigning activity that might compromise the position of the Boards. Board Members or involved customers intending to stand for political office must discuss the matter with the Chair.

A9 ***Board Members***

If you take up new employment or appointments during your term of office on the Board, you must make any necessary declaration of interest. Any such work or position must not interfere with your role as a Board Member.

B CONFLICTS OF INTERESTS

Main Principle

You must take all reasonable steps to ensure that no undeclared conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise.

Provisions

- B1 You must comply with the Boards' policies and procedures for declaring, recording and handling conflicts of interest. Amongst other things, these require you to declare any private interests which may, or may be perceived to, conflict with the duties of your role.
- B2 You must ensure that your entry in the Boards' register of interests is complete, accurate and up-to-date.
- B3 You must comply with the Boards' policies and procedures relating to the application for employment or housing from members of staff, Board Members, involved customers or others to whom they are related or closely connected¹.

¹ 'Closely connected' is defined in Appendix 1.

The Boards' policies and procedures are designed to ensure, and to demonstrate, that no preferential consideration is given to any such application.

B4 You must not be involved in the appointment of staff where you are related, or are closely connected, to an applicant. You must declare any such relationship to the Company Secretary. You must not be involved in decisions relating to discipline, promotion, pay or benefits for any member of staff to whom you are related or closely connected.

B5 You must not be involved in the appointment of a contractor or supplier where you are related, or closely connected, to an organisation or individual applying or tendering for a contract.

You must declare any such relationship to the Company Secretary. You must not be involved in establishing the terms of a contract, or its ongoing monitoring and management, where you are related, or closely connected, to the contractor or supplier.

B6 You must not use your position to secure any favourable service from a contractor or supplier as a result of your connection with the Boards.

B7 You must not use, or attempt to use, your position to promote your personal interests or those of any connected person, business or other organisation.

C BRIBERY AND / OR CORRUPTION

Main Principle

Bribery occurs when you offer, pay, seek or accept a payment, gift or favour to influence a business outcome improperly. Bribery and/or corruption – whether involving government officials, or commercial entities, including joint ventures – can be direct or indirect through third parties like agents and joint venture partners. It includes facilitation payments even though in some countries facilitation payments are legal. Even turning a blind eye to your suspicions of bribery and/or corruption can result in liability for the Boards and for you personally.

Provisions

C1 You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage.

C2 You must follow the anti-bribery and corruption laws that we are subject to. You are liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment if you are involved in bribery and/or corruption.

C3 Never offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment, to influence a business outcome or to gain any business advantage.

C4 Ensure people you work with understand that bribery and/or corruption is

unacceptable.

- C5 Tell the Boards' Company Secretary if you suspect or know of corruption in the Boards or in any party (company or individual) the Boards do business with.

D GIFTS AND HOSPITALITY

Main Principle

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.

Provisions

- D1 You must comply with the law and the Boards' policies and procedures in relation to the giving, receipt, approval and recording of gifts and hospitality.
- D2 You must not canvass or seek gifts or hospitality or other benefits.
- D3 If you are offered gifts or hospitality, they should either be declined, or prior approval sought for their acceptance. The only exceptions are gifts of token value or modest hospitality given in connection with normal events. The Boards' Entitlements, Benefits and Payments Management Policy regarding payments and benefits gives further guidance.

E FUNDS AND RESOURCES

Main Principle

You must not misuse the Boards' funds or resources.

Provisions

- E1 You must comply with the Boards' policies and procedures regarding the use of its funds and resources. 'Resources' includes but is not restricted to staff, information, telephone, computer and other IT facilities, equipment, stationery and transport.
- E2 You must ensure that the organisational funds and resources entrusted to you are used efficiently, economically and effectively.
- E3 You must comply with the Boards' policies and procedures regarding procurement, ensuring value for money and fairness in decision making.
- E4 You must take reasonable measures to protect the Boards' funds, resources, property and assets from theft, damage and misuse.
- E5 You must comply with the Boards' policies and procedures relating to the acceptable or unacceptable use of email, intranet and internet services.
- Amongst other things, these policies and procedures prohibit access to

pornographic or racist material, and the use of unauthorised or unlicensed software.

- E6 You must claim reimbursement only for expenditure that was properly and reasonably incurred in carrying out the Boards' business. You must ensure that any expenses claim you make is accurate, timeous and complies with the Boards' policies and procedures.

F CONFIDENTIALITY

Main Principle

You must handle information in accordance with the law and the Boards' policies and procedures.

Provisions

- F1 You must comply with the provisions of the Data Protection Act 1998 which governs the protection of personal data. All personal data held about customers and other service users, employees and others, whether on paper or electronically is subject to the provisions of the Act. The Boards' Data Protection Policy and procedures give further guidance.
- F2 You must not disclose without authority any confidential business information. This duty continues to apply after you have left the Boards or relinquished your position.
- F3 You must not, without permission, pass or distribute to the press or media or any other external recipient(s) information or materials relating to the Boards.
- F4 In your capacity as a Board Member or involved customer, you must not, without prior authority:
- a) appear to represent the views or position of the Boards
 - b) write letters to the press or other recipients about the Boards
 - c) write media articles, blog posts or tweets etc about the Boards and its activities
 - d) make comments or statements about the Boards to the media - if approached you must pass the enquiry to the appropriate person being either the Company Secretary or Director of the Association.
- F5 You must not prevent another person from gaining access to information to which they are entitled by law.

G RESPECT FOR OTHERS

Main Principle

You must treat others with respect at all times.

Provisions

- G1 You must comply with the law and with the Boards' policies and procedures relating to equality and diversity.

Equality laws prohibit discrimination on grounds including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, gender and sexual orientation and impose positive duties to eliminate unlawful discrimination and promote equality. The Boards' policies give further guidance.

- G2 You must not harass, bully or attempt to intimidate any person. The Boards' policy on Respect at Work gives further guidance.

- G3 You must not display materials in the workplace which other people might reasonably find offensive or use language which Board Members or staff or customers might reasonably find offensive.

H RELATIONSHIP BETWEEN BOARD MEMBERS, INVOLVED CUSTOMERS AND STAFF

Main Principle

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

Provisions

Board Members

- H1 You have a duty of loyalty and support towards the Boards and this must be reflected in a constructive, professional relationship with its staff.
- H2 You must not go beyond your role as a Board Member and become inappropriately involved in operational matters.
- H3 In your dealings with staff, formally and informally, you must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies and objectives of the Boards.

Board Members and Involved Customers

- H4 Where it is necessary to raise issues of poor staff performance at a formal meeting, these must be raised in a constructive way, aimed at getting things right in future, and not at criticising individuals. Any concerns about the performance of individuals must be discussed in confidence with the Chair of the Board, Committee or panel, or with the Chief Executive.
- H5 You must not appear to undermine the authority of a senior officer in his or her dealings with a more junior member of staff.

- H6 You must not ask or encourage a member of staff to act in any way which would conflict with compliance with this code or the Boards' policies and procedures.

Involved Customers

- H7 You must not seek to instruct or direct a member of staff or contractor. The relevant manager or member of staff must convey all instructions.

I RELATIONSHIP WITH CUSTOMERS AND OTHER SERVICE USERS

Main Principle

You must maintain high standards of professionalism, fairness and courtesy in all your dealings with customers and other service users.

Provisions

- I1 You must treat all customers and other service users with courtesy and respect.
- I2 You must not allow any personal relationship with a customer or other service user to conflict with your role and responsibilities.
- I3 You must not give gifts or loans of money to, or receive loans or gifts of money from, customers or other service users.
- I4 You must not invite or influence a customer or other service user to make a will or trust under which you are named as executor, trustee or beneficiary. You must not sign or witness such wills or trusts.
- I5 When handling the information relating to customers and other service users, you must comply with the law and the Boards' policies and procedures relating to the protection of personal data.

J HEALTH, SAFETY AND SECURITY

Main Principle

Your conduct must not endanger the health, safety or security of yourself or others.

Provisions

- J1 You must comply with the Boards' health and safety policies and procedures and bring to the attention of the appropriate person any risks to yourself or others. In particular, where you are provided with protective clothing this must be worn.
- J2 You must comply with the law and the Boards' policies on smoking and on the use of alcohol, drugs (whether illegal or prescribed by a medical advisor) and

other substances.

J3 You must comply with the Boards' policies relating to the security of premises.

K CONDUCT AT MEETINGS

Main Principle

Your conduct at meetings must show respect for all, and comply with the Boards' standards.

Provisions

K1 You must be courteous to all other attendees, and respect the position of the meeting chair.

K2 You must not use threatening or aggressive behaviour, or act in a disruptive way.

K3 You must not attend meetings while intoxicated or under the influence of drugs.

K4 If you have concerns about the conduct of a meeting, you should raise these with the appropriate responsible person.

K5 Once a Board, Committee or Working Group meeting has properly reached a decision in good faith, you must share responsibility for that decision, even when you had not supported it.

L REPRESENTING THE GROUP

Main Principle

In representing the Boards at external events and in dealings with outside bodies, you are an ambassador for the Boards and must uphold and promote its values, objectives and policies.

Provisions

L1 You must not become involved in, or be seen to endorse, any activity that may bring the Boards into disrepute. This includes but is not limited to illegal, immoral, racist or other discriminatory activity.

L2 In engaging in activities which promote the work of the Boards to the outside world, you must demonstrate commitment to the Boards and support for its values, policies and goals.

L3 In representing the Boards you must be appropriately dressed for the occasion.

M LEARNING AND DEVELOPMENT

Main Principle

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

Provisions

- M1 You must play an active part in the Boards' Board Member assessment processes and welcome constructive feedback.
- M2 At the appropriate induction or review meeting, you must make clear your personal training and development needs, so that they can be taken into account in the Boards' forward budgeting and planning.
- M3 Unless there are exceptional reasons, you must attend all learning and development events that have been arranged, either for you alone or as part of a group.
- M4 You must take responsibility for keeping your knowledge up to date in those areas in which you are a specialist.

N REPORTING CONCERNS

Main principle

You must report to the Company Secretary of the Boards any reasonable and honest suspicions you may have about possible wrongdoing.

Provisions

- N1 If you are aware of potentially dishonest or fraudulent activity, or material breaches of this code – by Board Members, staff, or others – you must report it to the Company Secretary within the Boards. The Association's policies and procedures relating to fraud and confidential reporting (whistle blowing) give further guidance.
- N2 If you believe that you are being required to act in a way which conflicts with this Code, you must report it to the Company Secretary and/or Chairperson within the Boards.
- N3 You must not victimise any person who has used – or intends to use, or is suspected of having used – the Boards' confidential reporting procedures to report the misconduct, or alleged misconduct, of others.

O DEALING WITH GOVERNMENT OFFICIALS

Main Provisions

The offering of gifts and hospitality including travel-related expenses for government officials creates special concerns. The principles below must be followed. Some countries have very strict limitations on the value and nature of gifts and entertainment their officials can accept. Gifts and hospitality that are acceptable between private business partners may be unacceptable between a business and an official. In addition, third party behaviour can result in liability for you and the Boards if you fail to conduct appropriate due diligence on third parties who deal with government officials on the Boards' behalf, or if you disregard the results of such due diligence.

Provisions

- O1 You must have permission from the Boards to offer gifts and hospitality to government officials.
- O2 The value of hospitality must not exceed the prescribed limit for the type of payment set by the Boards.
- O3 You must not offer gifts and hospitality to persons you know to be the spouses, family members or guests of a government official.
- O4 You must not pay for non-business travel and hospitality for any government official.
- O5 You must comply with all applicable laws and with the Boards' internal procedures regarding gifts and hospitality to government officials.

P BENEFITS FROM DISCOUNTS

Main Principle

No Board Member or involved customer is to gain any special advantage by virtue of their work with the Boards if they use the services of a consultant, contractor, professional advisor or other individual or firm they know also works for the Boards.

Provisions

- P1 Where possible, Board Members and involved customers should avoid making use of such services because of the responsibilities they have for the allocation of work to the suppliers of these services to the Boards.

Q PROMOTIONAL MATERIALS

Main Principle

The Boards may from time to time decide to produce promotional material and may make such materials available to Board Members and involved

customers.

Provisions

- Q1 In doing so the material will:
- a) clearly promote the Boards
 - b) the item will be of 'de minimus' value
 - c) also be made available to members of the public from time to time as part of a promotional exercise
- Q2 The Board will ensure that the scale of any such promotional activity is proportionate to the Boards' turnover, and that a budget for each activity is approved and reported on.

R SPONSORSHIP

Main Principle

The Boards may from time to time decide to sponsor a local club, team, or individual or give prizes for local events or competitions.

Provisions

- R1 The Boards will ensure that:
- a) Any club, team or other organisation being sponsored has a clear connection with the communities the Boards serve;
 - b) Any prize being offered is awarded as the result of fair and open competition, and is not given to a Board Member or to an involved customer; and,
 - c) Any Board Member or involved customer having a connection with any organisation or individual being considered for sponsorship or the awarding of a prize declares this interest and takes no part in the decision whether or not to offer the sponsorship or award the prize.
- R2 Tenant groups will be encouraged to make nominations for sponsorship within their geographical areas.

S MONEY LAUNDERING

Main Principle

Money laundering occurs when the criminal origin or nature of money or assets is hidden in legitimate business dealings or when legitimate funds are used to support criminal activities, including the financing of terrorism. Offences covered by anti-money laundering legislation include: prejudicing or obstructing an investigation and failing to report suspicious activity.

The Boards could be exploited by criminals to launder money or fund criminal activities. You must report suspicious transactions or incidents of money

laundering. Failure to do so can lead to fines, dismissal or imprisonment.

Provisions

- S1 Never deal with suspected criminals or the proceeds of crime.
- S2 Report any suspicious transactions or individuals to the Boards. (The Boards will in turn report appropriate matters to the authorities.)
- S3 Do not acquire, use or hold monetary proceeds or property acquired with the proceeds of crime.
- S4 Do not hide the origin or nature of criminal property.
- S5 Do not facilitate the acquiring, ownership or control of criminal property.
- S6 Do not forewarn the subject of an investigation.
- S7 Do not falsify, conceal, destroy or dispose of relevant documents.

T POLITICAL ACTIVITY AND PAYMENTS

Main Principle

Your political activity and payments risk being viewed as those of the Boards and may impact on our business or reputation.

Provisions

- T1 You must not contribute the Boards' funds or resources to political campaigns, political parties, political candidates or anyone associated with them. You must take all reasonable steps to ensure your personal political activities are not represented to be those of the Boards. Political activity and payments can cause a conflict of interest and can harm the Boards' business dealings and reputation. A failure to follow these requirements or any laws or regulations may result in disciplinary action, including termination of position.
- T2 Do not use the Boards' account for political payments or to make charitable donations as a substitute for political payments.
- T3 Do not allow the Boards' funds to be used via industry bodies or by other means to make party political contributions.
- T4 Comply with laws regulating political participation.

U ACTION TO DEAL WITH A BREACH

Main Principle

If, following investigation, a breach of this Code is confirmed, action will be taken in response. This action will reflect the seriousness of the circumstances. It may take the form of some or all of the following:

- an informal discussion between the Chairperson and/or Company Secretary with the Board Member or involved customer concerned;
- advice and assistance on how his or her conduct can be improved;
- the offer of training or other form of support;
- a formal censure; or
- a vote to remove the Member from the Board of Management or termination of role as involved customer.

The outcome of any investigation may be notified to The Scottish Housing Regulator depending on the circumstances.

Appendix 1

PEOPLE CONNECTED TO YOU

As well as considering their own actions, Governing Body Members and staff must be aware of the potential risk created by the actions of people with whom they are closely associated.

For example, where someone close to them is entering into an agreement with the Association, or they have significant involvement with one of our suppliers, they must follow the terms of this policy.

Governing Body Members and staff are expected to make reasonable efforts to ensure they are aware of actions or involvement by anyone with whom they are closely associated that comes under the terms of this policy, while applying logic and sound professional judgement to assess situations within which these are happening.

There are three groups of people that need to be considered in respect of the application of this policy as identified in the table below.

Group 1 Members of your household	Group 2 People closely associated with you	Group 3 Others you need to consider
<p>This is defined as: Anyone who normally lives as part of your household, whether they are related to you or not, including: spouses/partners who work away from home and sons and daughters who are studying away from home.</p>	<p>These are defined as: Parents, parents-in-law and their partners. Sons and daughters; stepsons and step-daughters and their partners. Brothers and sisters and their partners. A partner's parent, child, brother or sister. Grandparents, grandchildren and their partners. Someone who is dependent on you or on whom you are dependent. Close friends.</p>	<p>These are defined as: Other relatives; uncles, aunts, nieces, nephews and their partners. Other friends: someone you are acquainted with socially; neighbours; business contacts/associates.</p>
<p>You must always declare any issues, covered in this policy, which are affected by people in the above group.</p>	<p>If you are in regular contact with people listed in the above group, you should declare any issues, covered in this policy, involving them.</p>	<p>We expect you to exercise sound judgement and a logical approach when deciding if there is a need to declare any issues relating to people covered by the list above.</p>

We recognise that Governing Board Members and Staff will not always be closely acquainted with or in regular contact with all of the people listed in the table above and we do not expect them to go to unreasonable lengths to identify areas they are involved with that are covered by this policy. However we do expect our people to be familiar with the actions of members of their household (Group 1) and of any other people listed in the table above with whom they are in regular contact.

Annual Declaration form

This form should be completed annually, and also at any time when a new matter to be declared arises and is in addition to any declaration of interest made at the start of each Board/Committee meeting. Leave blank any boxes that are not relevant to the declaration. Please add any other relevant information on another sheet of paper which should also be signed and dated. Completed forms should be given to the Company Secretary, and will be recorded as appropriate in the Boards' register of interests, or the register of gifts and hospitality.

Your details

Name _____

Your position (Board Member/Involved Customer) _____

Home Address _____

Date of Declaration _____

Details of the Declaration	
Please give details of who this declaration concerns – you, a family member, close relative, friend or associate?	
Please give details of any firm or business involved.	
Please give details of any payment, benefit, transaction, contract, property, gift or hospitality that is involved (with date)	
Is there any reason why this declaration should be regarded as confidential? Please give details.	

I confirm that all hospitality extended to or by me and all gifts received has been entered in the Boards register and in accordance with the Policy on Gifts and Hospitality.

Signed (Board Member/involved customer): _____

Signed (Company Secretary): _____

Date: _____

Acceptance

I _____ have read and understood the terms of this Code of Conduct and I agree to uphold its requirements in all my activities as a member of the Boards/involved customer. I confirm that I am aware of the restrictions on payments and benefits and personal interests. I agree to review my declarations regularly to ensure that all entries relating to me are accurate. I understand that, if I am found to have breached this Code of Conduct, action will be taken which could result in my removal/dismissal.

Signed _____

Date _____