

Code of Conduct

People Services

Policy approval date 13/10/26

Date of next review 13/10/29

Contents (ctrl and left-click to navigate to each section)

1. Purpose
2. Scope
3. Legislation
4. Principles
 - 4.1 Our Riverside Way
 - 4.2 Respecting Each Other
 - 4.3 Financial Conduct
 - 4.4 Tendering Procedure
 - 4.5 Relationships
 - 4.6 Accountability
 - 4.7 Transparency
 - 4.8 Data Protection and Confidentiality
 - 4.9 Employment Matters
 - 4.10 Non-Contractual Payments, Housing and Other Benefits
 - 4.11 Health Safety and Security
 - 4.12 Gifts, Hospitality and Corporate Donations
 - 4.13 Outside Activities
 - 4.14 Declaration of Interest
 - 4.15 Membership of Secret Organisations

Homes for the life you want to live

riverside.org.uk

The Riverside Group Limited Registered office: 2 Estuary Boulevard, Estuary Commerce Park, Liverpool L24 8RF

A charitable Registered Society under the Co-operative and Community Benefit Societies Act 2014 (Reg No 30938R)

- 4.16 Equipment and Materials
- 4.17 Representing Riverside
- 4.18 Disclosure and Barring Checks and Safeguarding
- 4.19 Duty of Candour
- 4.20 Failure to Follow Code of Conduct for Colleagues
- 4.21 Confidential Reporting or Whistleblowing
- 5. Further information and support
- 6. Roles and responsibilities
- 7. Risks
- 8. Appeals and complaints
- 9. Monitoring and assurance
- 10. Equality, Diversity and Inclusion
- Appendix 1 – Terminology, Family Members and Close Connections and Connection with an Organisation

1. Purpose

Riverside is a complex business, and colleagues are required to carry out their duties in accordance with our policies and procedures. The manner in which colleagues conduct themselves whilst undertaking the work of Riverside must reflect Our Riverside Way. Compliance with the standards in this code will help to protect the reputation of both Riverside and its colleagues whilst enabling us to best serve our customers.

Furthermore, The Code of Conduct supports compliance with the Social Housing (Regulation) Act 2023 and the Regulator of Social Housing's Competence and Conduct Standard, setting out the behaviours and standards expected of colleagues, particularly those in roles impacting tenants, customers and service delivery.

2. Scope

This Policy applies to all colleagues at Riverside and relief and agency workers.

The Code of Conduct forms part of the contract of employment for all colleagues. On joining Riverside colleagues must sign that they have read and understood the Code and that they will act in accordance with it. Revisions of the Code of Conduct will be communicated to colleagues and assumed agreed unless otherwise notified to People Services.

Breaches of the Code of Conduct will be investigated and may lead to misconduct action which, if serious, could result in dismissal.

3. Legislation

The Code of Conduct has been written in compliance with all relevant employment, health and safety and social housing legislation. This includes but is not limited to:

- Equality Act 2010
- Employment Rights Act 1996
- Health and Safety at Work etc. Act 1974
- Protection from Harassment Act 1997
- Bribery Act 2010
- Data Protection Act 2018 / UK GDPR
- Public Interest Disclosure Act 1998
- Social Housing (Regulation) Act 2023

4. Principles

4.1 Our Riverside Way

Our vision is *Homes for the life you want to live.* Our Riverside Way sets out our values and the professional behaviours we can expect from all colleagues. It weaves through all we do and guides the actions we take and the decisions that we make when we are interacting with each other, our customers and our partners.

We care

We put our customers first every time, going the extra mile to make sure we deliver great homes and services that they need and want.

Put customers first

- Actively listen to understand needs, providing a quality service and delivering first time where we can, communicating well where we can't
- Are genuine, showing empathy and care, ensuring a great customer experience every time

Do the right thing

- Deliver on promises, finishing what we start and doing what we say when we say
- Act with integrity and have open and honest conversations, challenging anything that goes against our values or professional standards

Make a difference

- Stand up for our beliefs, co-creating and working in partnership with our customers, helping to improve lives and providing equal access to homes and services
- Are open to new ideas, finding ways to simplify and do things better, more effectively and efficiently

We are inclusive

We respect and value the diversity of our customers and colleagues, welcoming and appreciating the contribution of others.

Value People

- Champion belonging, challenging discrimination and appreciating diversity, always treating others with dignity, fairness, and respect
- Celebrate success, recognising and saying thank you for a job well done

Realise Potential

- Ensure we can all be our true selves at work, removing barriers which could cause disadvantage
- Seek opportunities to develop, fulfilling our potential and inspiring others to achieve theirs

Work together

- Collaborate effectively as one team, offering help and support, sharing ideas and experiences to deliver the right outcome
- Have pride and real purpose, trusting a believing in ourselves, each other, and our customers

We are trusted

We have high standards and work hard to meet them, taking ownership and performing at our best.

Give it our all

- Are open to giving, receiving, and acting upon feedback, performing at our best and playing our part in delivering what we must
- Consider the facts, risks, and impact to make the right choices, owning it, and learning when we get it wrong
- Are resilient, determined and have a positive can do, will do attitude

Take responsibility

- Are empowered, acting decisively, and working at the right pace
- Consider the facts, risks, and impact to make the right choices, owning it, and learning when we get it wrong

Deliver standards

- Don't walk on by, always aiming to get it right first time, never compromising on our safety and quality standards
- Comply with policies and processes, but make suggestions and improvements if they get in the way of putting our customers first

All colleagues are expected to act with integrity, honesty and transparency at all times. This includes being open about mistakes, declaring conflicts of interest, providing accurate information, using Riverside resources responsibly and maintaining the trust placed in us by customers, colleagues, partners and regulators.

4.2 Respecting Each Other

Riverside believe that all colleagues, customers and external parties have the right to be always treated with dignity and respect. We value the diversity of our colleagues and customers and are committed to enabling everyone to be their authentic selves and participate without fear of

harassment, bullying or victimisation. Colleagues must recognise and respond appropriately to the diverse needs and vulnerabilities of tenants, ensuring services are delivered in a fair, inclusive and accessible way.

Colleagues are responsible for ensuring that their own behaviour, whether intentional or unintentional does not constitute discrimination, bullying, harassment or victimisation. For more information see Dignity at Work Policy.

Colleagues should not display material or use language that others may find offensive or be involved in any activity that may bring Riverside into disrepute.

At meetings and events whether internal or external colleagues are ambassadors for Riverside and must be courteous to all other attendees and conduct themselves in an appropriate manner, role modelling and promoting Our Riverside Way.

Colleagues should always consider their own behaviour and the impact that this can have on others, working cooperatively, considering different perspectives and giving constructive and appropriate feedback as part of normal day to day work.

4.3 Financial Conduct

Colleagues should ensure that any funding, monies and/or resources for which they are responsible are used for the purpose intended, in a responsible manner and in accordance with the Finance Policy and the law.

As set out in the Anti-Bribery and Corruption Policy, it is a disciplinary offence and can also be a criminal offence for a colleague to offer, promise or give or to request, receive or accept a financial or other advantage in return for doing or not doing anything, or showing favour or disfavour. All suspected instances of fraud, bribery or corruption should be reported to the Corporate Compliance and Assurance Team. Where a colleague has concerns about negative repercussions, they may use the process set out within the Group's Whistleblowing Policy instead.

Colleagues must not borrow money from, or lend money to, applicants, contractors, consultants, professional advisers and suppliers or customers.

In addition, colleagues are in positions of trust and authority with customers. To ensure colleagues and customers are safeguarded, on no account are they to act as appointees or nominees to manage money or the financial affairs for customers. Neither are they to handle money on their behalf, other than when they are authorised to do so, and this should be done in line with any agreed, documented procedure. If in very exceptional circumstances such an instance occurs, the manager is to be informed immediately, giving the circumstances and reasons. In these exceptional circumstances colleagues must take extreme care, including issuing receipts for every transaction. Riverside's financial procedures should be followed at all times and the relationship must be declared in the Declarations of Interest Form.

Colleagues may not receive loans and may not give loans from their personal money to customers.

If an allegation of corrupt behaviour is made, a full investigation will take place and as part of this, colleagues will be required to be able to demonstrate that any benefits they have been given have not been corruptly obtained.

4.4 Tendering Procedure

Colleagues must exercise fairness and impartiality when dealing with all consultants, suppliers, contractors and sub-contractors. All orders and contracts must be awarded on agreed principles such as merits, using the most economically advantageous tender (MEAT) methods. Riverside tendering and procurement procedures must be followed in full to ensure that there is impartiality at all times. Please refer to The Procurement Policy for further information.

4.5 Relationships

Each colleague is expected to maintain effective professional and working relationships with colleagues, customers and external contacts.

Colleagues should recognise and respect the role that Board and Committee Members perform in the running of Riverside. Colleagues should not use informal channels to influence Board Members or Committee Members on matters of Board / Committee business.

Colleagues should always give their first name and job title to any customer or member of the public with whom they have contact. All colleagues are provided with an identification pass and are expected to wear it whilst working. They should always be courteous, efficient and adopt an impartial manner.

Colleagues should respect personal boundaries and not develop an intimate relationship or friendship with a customer who they are dealing with as part of their duties of employment. They must not socialise or take holidays with customers unless the event is authorised by their manager (this does not apply to a colleague's family members who may be customers as long as they are not dealing with them as part of their duties of employment or any friendships forged prior to the professional relationship). Colleagues must ensure that any relationship, whether family or not, does not conflict with their duties or the best interests of any other customer.

Should colleagues find themselves in an unplanned social meeting with customers or applicants for housing, they should be sensitive to the occasion and be mindful of the normal confidentialities of working within Riverside.

Colleagues must not encourage or influence a customer to make a will or trust under which they are named as executor, trustee or beneficiary. Colleagues cannot benefit from any such legacy, whether solicited by them or not, unless the relationship is declared on register of interest via a Declarations of Interest Form.

A colleague may have relationships with individuals or organisations whose interests conflict with those of Riverside. As set out in the Probity Policy, all such relationships are to be declared, and clear steps taken to mitigate any potential conflicts. This includes when family members or friends are customers of Riverside as well as instances of current or past relationships of a business or private nature, with external contractors/suppliers or prospective contractors/ suppliers. The colleague

should declare their interest and not use their position to gain any advantage or preferential treatment for the other party.

Riverside recognises that colleagues who work together may form personal friendships and, in some cases, close personal relationships. We accept that such relationships may involve colleagues spending time together or socialising outside of working time. While we do not wish to interfere with these personal relationships, it is necessary for the organisation to ensure that all colleagues behave in an appropriate and professional manner at work. Colleagues should respect each other's boundaries and any relationship extending beyond a professional capacity should only ever be based on consent.

Where a close personal relationship exists or develops between colleagues, or with contractors, consultants, suppliers or prospective suppliers etc., the individuals concerned should advise their manager and complete a Declarations of Interest Form as set out in the Probity Policy.

The relevant Director may preclude the awarding of a contract to the individual or organisation. The information is to be passed to the Governance Team to be held in the Register of Interests. Colleagues must not allow any such relationships to affect the manner in which they undertake their duties.

Where any conflict or potential conflict of interest arises, in addition to updating the register, colleagues should have no further involvement in any relevant process or matter and should take care to avoid any suggestion of impropriety.

Our employment application form also requires all applicants to declare any relationship they may have to a Board/Committee Member or to a colleague. Failure to declare such a relationship may, once known, result in dismissal or the withdrawal of an offer of employment.

Colleagues must never manage or be managed by a family member or someone with whom they are in close personal, family or intimate relationship with. If a new relationship develops between colleagues who are within the same management chain, the relevant Director should be informed so the situation can be assessed and appropriate measures put in place.

4.6 Accountability

In carrying out their duties, colleagues are expected to act in the best interests of Riverside and its customers, promoting safe, high-quality services and positive outcomes. Where these interests may conflict, colleagues should consider the relevant evidence, risks and impacts and seek appropriate guidance before taking action.

Colleagues are expected to be accountable for their decisions, actions, and carry out their roles in accordance with this Code of Conduct, Our Riverside Way and other relevant policies and procedures.

Colleagues should actively seek, listen to and value customer views and lived experiences when delivering services, making decisions and designing improvements. Customer feedback, engagement and scrutiny should be viewed as an essential part of delivering high quality services and improving

outcomes and where customer feedback has led to a change in service, colleagues should support clear communication of the outcome and demonstrate how customer views have been considered.

Colleagues are expected to demonstrate professionalism in all decisions, actions and interactions. Decisions should be made objectively, fairly and in accordance with Riverside's values, policies and delegated authority, taking account of relevant evidence, risks and the impact on customers, colleagues and communities.

We prioritise customer safety and wellbeing, placing customers at the centre of our decisions and actions. Colleagues are expected to take personal responsibility for maintaining safe, compliant and high-quality services and for acting in a way that upholds Riverside's values and standards.

Riverside sets out to act in an open and accountable way in relation to colleagues, customers, local communities, local authorities and partner agents. It believes that information about Riverside, its work, Boards and colleagues that is not confidential, should be available to those with a legitimate interest.

The law also requires that certain types of information must be available to auditors, regulatory bodies, customers and the public. Colleagues should be aware of which information Riverside is open about, and act accordingly. If in any doubt, colleagues must refer to their manager.

Colleagues are expected to act within the limits of their competence and authority and are responsible for ensuring they have the appropriate skills, knowledge, experience, behaviours and training (including mandatory learning) to carry out their role safely and effectively. Where this is not the case, colleagues must seek guidance and support. The assessment, development and management of competence is supported through Riverside's People Performance Policy.

4.7 Transparency

Riverside aims to be open and accountable to customers, stakeholders and other service- users. We aim to make information easy to find for other interested parties such as partners, regulators, politicians and members of local communities. This does not include personal information, which is subject to Data Protection Laws.

We also encourage colleagues or others with serious concerns about any aspect of our work to come forward and express concerns (please see Whistleblowing for further information)

Our guiding principles are that we will:

- Provide information in a way which reflects the wishes and needs of customers and other interested people
- Make information available about our plans, decisions, policies, standards, and performance
- Provide information about how we are governed, our finances and how we achieve value for money
- Make sure information is easy to find, relevant, accurate and wherever possible self-explanatory
- Respond to requests in a way which is cost effective and proportionate
- Always act lawfully and comply with any requirements set by our regulators

Guidance for colleagues on the Riverside's approach to transparency can be found on the RIC.

4.8 Data Protection and Confidentiality

Riverside is committed to compliance with all relevant laws in respect of personal data. Personal data is valuable, and all colleagues must always act fairly, ethically and with integrity when dealing with it. The Data Retention Policy ensures that Riverside acts reasonably and responsibly regarding the period for which records are retained. The fair and lawful handling and protection of personal data is critical to developing trust and confidence and building and sustaining long term relationships with those we service and care for.

Personal data must only be shared (internally or externally) where there is a valid legal basis to do so. Colleagues must apply the relevant data classification to all communications and documents. All colleagues must process personal data in line with the requirements of the Riverside's Data Protection and Privacy Policy and Acceptable Use Policy. Failure to do so may cause a data breach, which is a breach of Data Protection or information security that leads to the destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

The consequences of a data breach can include:

- Riverside losing trust, reputation and integrity in the eyes of our existing and future customers, colleagues and partners
- Loss of existing and future relationships/service opportunities with local authorities
- Customers and/or Regulators taking legal or enforcement action against Riverside
- Damage and distress, or financial/material loss to individuals
- Impacts to Riverside's day-to-day operation and the provision of services whilst a breach is investigated
- Financial penalties imposed by a number of Regulators

Colleagues should contact Riverside's Data Protection Officer for advice and guidance.

Colleagues may also have access to non-personal confidential information which may be commercially sensitive and/or of monetary value to others. Some colleagues may operate software applications or other systems and procedures which are provided on a licensed basis, being supplied under copyright protection or as commercial-in-confidence. In all instances, colleagues must not disclose or copy any such information with the intention to pass it on to a third party; or use the information for any purpose other than that which they are required to by Riverside. Colleagues may also be required by suppliers to sign further declarations of confidence (or non-disclosure agreements). If this is the case, they are to advise their manager who will then inform Procurement.

Colleagues must not use any information obtained in the course of their employment for personal gain or benefit, nor should they pass it on to others who might use it in such a way.

4.9 Employment Matters

Colleagues involved in making recruitment appointments must ensure that these are made on the basis of merit alone and comply the Riverside's Recruitment and Selection Policy.

If a colleague is aware that a friend or relative has applied for employment with Riverside, they should make a full disclosure of their connection by informing their manager. Consideration of the application is then based solely on merit and suitability in relation to the requirements of the post.

Any colleague with a close personal connection to the applicant cannot play any part in the assessment or decision to appoint.

Colleagues should not be involved in making decisions relating to a disciplinary, grievance, promotion or pay adjustments for any other colleague who is a relative, partner or friend.

4.10 Non-Contractual Payments, Housing and Other Benefits

Colleagues may not receive any payment, grant or loan from any funds associated with Riverside except under their contracts of employment or as reimbursement of legitimate expenses or as per approved policy. Legitimate payments would include the termination of employment by means of a settlement agreement or any payment made in respect of employment disputes. Any such agreement must be authorised by a director through the appropriate channels.

To avoid the risk being seen to favour its colleagues unfairly, Riverside has strict rules about the allocation or sale of housing to colleagues or to others to whom they are closely connected. Colleagues therefore must declare their interest or connection with anyone applying to rent or buy housing from Riverside to their manager and as set out within the Probity Policy. Consideration of any application from a colleague or any of their relatives or anyone to whom they are closely connected, is based solely on published allocations criteria. No person having any direct personal connection to the applicant can play any part in the assessment or decision.

In cases where colleagues (or others with whom those persons are closely connected) are existing customers and apply for a transfer or re-housing, a full disclosure of the individual's interest or connection should be made to their manager. No preferential consideration is given to the application, and the colleague should not be involved in any of the decisions on the application.

4.11 Health Safety and Security

You must comply with all Health, Safety and Environmental policies, procedures, safe systems of work, Risk Assessments, training and bring to the attention of the appropriate person any risks to yourself or others. In particular:

- where you are provided with protective equipment, this must be used
- for your own safety, you must comply with policy and procedures relating to lone working and personal safety
- You must report all accidents and incidents relating to health safety and environment on SAW-IT
- Where a reasonable management instruction is requested for your safety or that of others

Colleagues must comply with policies relating to the security of premises.

Colleagues must comply with the Alcohol, Drugs and Other Substance Misuse Policy. All colleagues have a duty to ensure that when they are at work they are fit and capable to work and that their ability to work is not impaired by alcohol or drugs (either prescribed or non-prescribed) or such similar substances. Riverside has a duty of care to its colleagues whilst at work and as such places a total restriction on the use of non-prescribed drugs in the workplace. Similarly, colleagues must not drink alcohol during their contracted hours of work or whilst working with customers outside

of these hours or if they are still under the influence of earlier use of alcohol or drugs. All of the above circumstances are classed a gross misconduct and could result in disciplinary action and potential dismissal.

4.12 Gifts, Hospitality and Corporate Donations

It is important that colleagues only accept gifts, hospitality and donations when it is appropriate and that this is done in a legal and transparent way. This protects colleagues and Riverside's reputation from accusations of unfair or inappropriate decision making or wasting resources.

To ensure decisions taken are always in the best interest of Group, its customers and stakeholders, rules around the receiving of gifts, hospitality and corporate donations are set out in the Probity Policy as are the rules for offering donations. The Group Expenses, Mileage and Travel Policy sets out rules for offering hospitality.

The following key points apply:

- Colleagues, and the Group, should be open and transparent about gifts, hospitality, and corporate donations
- The default position is that gifts or hospitality for personal benefit must never be solicited and if offered should be declined
- Exceptions to the above must be disclosed and treated as per the Probity Policy. In each instance one must be able to demonstrate that there was no attempt to bribe another person or organisation
- Donations to or from any political party are not allowed
- Offers and acceptance of gifts, hospitality and corporate donations must be promptly declared using the declaration process. Failure to declare could lead to disciplinary action being taken
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See the Probity Policy for further information.

Where an outside organisation wishes to sponsor a Riverside activity, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts or hospitality will apply. Particular care must be taken when dealing with contractors or potential contractors.

Where Riverside wishes to sponsor an event or service, neither a colleague, nor any friend, partner nor relative must benefit from such sponsorship in a direct way without there being full disclosure to an appropriate manager of any such interest.

Similarly, where Riverside through sponsorship, grant aid, financial or other means, gives support in the community, a worker should ensure that impartial advice is given and that there is no conflict of interest involved. See the Probity Policy for more information on how to make declarations of interest.

4.13 Outside Activities

As an employer Riverside have no wish to interfere in the private lives of colleagues. There may, however, be some circumstances where the outside activities of colleagues could overlap or conflict

with the interests of Riverside. If in any doubt, colleagues should discuss the situation with their manager and seek any necessary written permission.

Colleagues must obtain written permission before undertaking outside activities that arise through their work, or that makes use of material to which they have access by virtue of their position. This applies to both paid and unpaid work and to voluntary activity.

Colleagues should inform their manager if they want to take on any outside paid employment in addition to their employment with Riverside. Where colleagues are offered and accept new employment with Riverside, they must also advise their manager if they are employed by any other organisation or undertake any other work on a self-employed/contractor basis. In both scenarios, this is primarily to protect colleague health and safety but also to identify any potential conflict of interest. In all circumstances, the colleague should complete and submit the Declarations of Interest form as set out in the Probity Policy.

When colleagues are paid for writing or speaking on work or Riverside -related activities, the sums obtained must be paid to Riverside. Even if colleagues take annual leave to prepare for and undertake such activities, they cannot accept payment personally unless they have the written approval of their manager.

In any situation where a colleague's external paid employment or interests could overlap or conflict with the Riverside's interests, this activity should be declared. An example of this could be where a colleague owns and rents accommodation in areas where Riverside has property. If a situation should arise through such interests or out of work activity, which brings Riverside into disrepute, the disciplinary procedure may be invoked.

Paid outside work of any sort should not be undertaken on Riverside premises, and no use should be made of facilities e.g. telephones and postage in connection with such work. This also applies to any unpaid or voluntary activity, unless colleagues have written permission from their manager and the extent of the work is minimal.

Colleagues should not use their position to gain favour or advantage through the use for private purposes of suppliers, contractors, or consultants used by Riverside. If there are circumstances when colleagues have no option but to use the Riverside's suppliers or contractors for personal services, they must not receive more favourable treatment. This usage must be declared to their manager along with justification for the choice of contractor along with written consent from Riverside and an entry made in the Register of Interests via completion and submission of the Declarations of Interest Form.

Riverside requires colleagues engaged in the public arena to respect Our Riverside Way and to avoid conflicts of interest. They should not allow their own personal or political opinions to interfere with their work or their professional impartiality.

If colleagues wish to volunteer, or if they are invited to join the Board (or committee) of another social landlord or voluntary agency, they should obtain the prior approval of their Director and update their Declaration of Interest Form. Colleagues will be expected to be sensitive to any conflicts that may subsequently arise, which will need to be declared.

4.14 Declaration of Interest

Riverside has a reputation for high standards of conduct and probity. Legislation and the ethos of the sector reinforce these standards.

As well as the registers required for gifts and/or hospitality, Riverside maintains a formal register of the interests of Board members and colleagues. On joining Riverside, colleagues are required to complete a Declaration of Interest Form. Any interests are added to the register. Declarations of Interest Forms are to be reviewed annually and updated whenever a new interest arises. These registers will normally be available for public inspection, unless there is a good reason for confidentiality. See the Probity Policy for more information.

If, whilst at work, colleagues are present at a Board or committee meeting and an item is discussed which poses a conflict of interest, colleagues should declare the interest. If the conflict is clear and substantial, colleagues should take no part in the discussion and decision and should offer to leave that part of the meeting.

If a colleague fails to knowingly declare any interests or is found to have falsified any information on the register of interests this could be viewed as gross misconduct. This could result in action being taken against a colleague up to and including dismissal.

4.15 Membership of Secret Organisations

Colleagues should declare to their manager and enter the information in the Register of Interests if they are a member of any organisation which has secrecy about its rules or membership (unless to do so could result in discrimination on grounds of any of the protected characteristics referred to in the Equality Act 2010.) Riverside is an open organisation and would have a concern if any colleague joined an organisation that did not share this value.

4.16 Equipment and Materials

Colleagues are not to use equipment provided by Riverside for purposes other than authorised business without prior permission of their manager. Personal telephone calls within reason are permitted – see IT Usage Policy. The IT and communication resources must be used appropriately this includes, telephones, mail delivery services, photocopying, computer hardware and software. Colleagues must comply with the; IT Acceptable Use Policy, IT Code of Practice, and Social Media Policy.

4.17 Representing Riverside

Riverside works in a changeable sector, and our ability to raise the funds we need to continue to work and to develop and improve facilities and services depends very much on maintaining a good profile.

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

In engaging in activities which promote the work of Riverside to the outside world, you must demonstrate commitment to Riverside and support for Our Riverside Way, policies and goals.

No one who works for Riverside may give information to the media about the organisation and its work without the agreement of a Head of Service, Director or Executive Director. In addition, no members of the media should be allowed to enter our premises or speak to customers without permission from a Head of Service, Director or Executive Director.

In representing Riverside at formal or informal events, colleagues should consider the setting and ensure that they are appropriately dressed for the occasion.

Colleagues are expected to maintain acceptable personal hygiene habits and to report to work dressed in an appropriate manner.

4.18 Disclosure and Barring Checks and Safeguarding

Riverside uses the Disclosure and Barring Service (DBS) to assess applicants' suitability for positions of trust and to ensure we comply fully with the DBS Code of Practice.

Colleagues and Board members may be privy to protected information and access in respect of our customers and therefore will be required to provide a DBS check to ensure that any individual is not barred from working with children or adults in vulnerable circumstances.

For a full listing of job roles and appropriate level of DBS Checks, please refer to the Criminal Record Check Policy.

Where a disclosure check gives cause for concern, a risk assessment must be performed in line with the Criminal Records Check Policy to evaluate the nature and seriousness of the information disclosed. Any decision made may warrant disciplinary action, up to and including dismissal from role.

If during the course, of their employment colleagues are charged with or convicted of a criminal offence, they must disclose this to their manager at the time it occurs, and not wait until a new DBS check or renewal is required (in applicable roles). Failure to do so could result in disciplinary action.

Where a colleague is subject to a police investigation and this could create conflict or risk within their role, or presents a reputational risk to Riverside, they should inform their manager at the time it commences or as soon as reasonably possible thereafter.

All colleagues are expected to abide with Riverside's Adults and Children Safeguarding Policies and Procedures. Colleagues also have a duty to ensure that action is taken if they have any concerns about an adult or child at risk of abuse or neglect. Concerns must be reported to a manager, Regional Operations Manager, Head of Service or Safeguarding Lead, and under the Care Act 2014, the relevant safeguarding teams and/or the police must also be notified. Colleagues must be mindful at all times of their actions and behaviour and how these may be interpreted, particularly whilst working with customers. Colleagues must avoid placing themselves in positions that may cause customers to

feel uncomfortable and which can lead to questions and/or false accusations of abuse.

4.19 Duty of Candour

The duty of candour is a duty to be open and transparent with people to whom one is providing care. All colleagues in services where the Duty of Candour applies are expected to familiarise themselves and abide by CQC's Guidance on this matter, as set out in Regulation 20 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 (Part 3)

4.20 Failure to Follow Code of Conduct for Colleagues

Failure to follow this Code of Conduct may damage Riverside and its work and so will be viewed as a disciplinary matter, to be dealt with under the normal disciplinary procedure. Where concerns relate to competence as well as conduct, appropriate support, development or performance management may be implemented alongside or instead of formal disciplinary action, in line with relevant people policies.

Colleagues must bring any matters which contravene The Code of Conduct for colleagues and/or which may have adverse repercussions for the reputation of Riverside or the sector, to the attention Chief Executive Officer or the Chair of the Board. Where this is not appropriate, for example where the allegations relate to the conduct of these post holders, then notice must be given as provided by Riverside's Whistleblowing Policy.

4.21 Confidential Reporting or Whistleblowing

Riverside promotes a culture where colleagues feel safe and supported to speak up, challenge poor behaviour or raise concerns without fear of detriment.

If you are aware of potentially dishonest or fraudulent activity or material breaches of this Code – by Board Members, colleagues or others – you must report it to your manager or to a senior manager within Riverside. Riverside's policies and procedures relating to fraud and confidential reporting (whistleblowing) give further guidance.

If you believe that you are being required to act in a way which conflicts with this Code, you must report it to an appropriate senior manager within the Organisation.

If you feel that you cannot report a serious breach of this code, or any other substantive breach of regulations, you can raise it with a relevant authority (see Whistleblowing Policy).

You must not victimise any person who has used, intends to use, or is suspected of having used the Group's confidential reporting procedures to report the misconduct, or alleged misconduct, of others.

5. Further information and support

Disciplinary Policy & Guidance

Grievance Policy & Guidance

Whistleblowing Policy
IT Usage Policy
IT Code of Practice
Social Media Policy
Dignity at Work
Drugs & Alcohol Policy
Disclosure and Barring Service Procedure
Data Protection and Privacy Policy
Recruitment and Selection
Procurement Policy
Probity Policy
Anti-Bribery and Corruption Policy
Finance Policy
Equality, Diversity and Inclusion Policy
Safeguarding Adults Policy
Safeguarding Children and Young People Policy
Transparency & Access to Information Policy
Customer Care Policy
Dress Code Policy

6. Roles and responsibilities

Colleagues

Colleagues are responsible for adhering to the principles set out in this Code of Conduct and ensuring that their behaviour reflects Our Riverside Way.

Managers

Managers are responsible for acting as role models and consistently demonstrating behaviours that reflect Our Riverside Way. They must ensure that their teams adhere to the Code of Conduct, investigate potential breaches appropriately and promote a culture of professionalism. Managers should ensure that expected standards are understood and that any poor conduct or inappropriate behaviour is addressed promptly and consistently.

People Services

People Services is responsible for providing advice and support to managers and colleagues in relation to the Code of Conduct. People Services will also ensure that new colleagues receive a copy

of the Code before commencing employment.

7. Risks

Reported grievances and disciplinary cases and outcomes relating the Code of Conduct are recorded and reported through the People Management reporting. This protects Riverside by ensuring any trends are identified early and that formal procedures are instigated with in a timely manner.

8. Appeals and complaints

Any concerns arising because of, or in connection with the Code of Conduct, should be explored and resolved informally wherever possible and appropriate.

Where concerns cannot be resolved informally, they may be managed in accordance with the relevant employee relations, conduct, or governance policy and procedures.

9. Monitoring and assurance

The effectiveness of this Code of Conduct will be monitored through employee relations activity, conduct concerns, grievance and disciplinary outcomes, safeguarding issues, whistleblowing concerns, customer feedback and other relevant governance processes.

Riverside will regularly review trends and themes arising from these sources to identify opportunities for learning, improvement and cultural development.

The Code will be kept under review to ensure it remains up to date, effective and aligned to legal, regulatory and organisational requirements.

Customers will be provided with meaningful opportunities to influence, review and scrutinise the development and operation of this Code in accordance with applicable regulatory expectations.

10. Equality, Diversity and Inclusion

Riverside is committed to Equality, Diversity & Inclusion. We strive to be fair in our dealings with all people, communities and organisations, taking into account the diverse nature of their culture and background and actively promoting inclusion. This policy aligns with Riverside's Equality, Diversity and Inclusion Policy and has been subject to an Equality Impact Assessment.

Appendix 1 – Terminology, Family Members and Close

Connections and Connection with an Organisation

Terminology

- ‘Board member’ includes all members of governing bodies whether they are formally known as Directors, Trustees, Board Members, management committee members etc. It includes co-optees and any other nominee. This applies whether or not the co-optees or nominees enjoy voting rights. In this context it also includes members of board committees who are not members of the main governing body.
- ‘Colleague’ includes the Group’s paid colleagues and any other persons fulfilling the role of a paid colleague such those employed by an agency or on secondment from another organisation
- ‘Contractors’ includes those other than board members, colleague and involved customers who are directly involved in delivering the Group’s business activities. This includes contractors, sub-contractors, consultants and agents

Family Members and Close Connections

The code refers to persons with whom board members, colleague or involved customers who are closely connected. A ‘closely connected’ person includes family members and persons with whom the individual has a close association.

In this context, ‘family member’ is given a very wide meaning and includes persons who might reasonably be regarded as similar to family members even where there is no relationship by birth or in law. It includes:

- a partner (someone to whom the individual is married, a civil partner or someone with whom they live in a similar capacity)
- parent, parent-in-law
- son or daughter, stepson or stepdaughter, the child of a partner
- brother or sister, brother or sister of a partner, grandparent, grandchild, uncle or aunt, nephew or niece
- the partners of any of these people
- any dependents, and
- any person on whom the individual depends

It includes estranged, separated and divorced family members (and estranged, separated and divorced persons who might reasonably be regarded as similar to family members).

A person with whom the individual has a ‘close association’ is someone with whom they are in regular or irregular contact over a period of time who is more than an acquaintance. It would be someone a member of the public might reasonably think the individual would be prepared to favour or disadvantage when discussing a matter that affects them. It may be a friend, colleague, neighbour, business associate or someone known through general social contacts.

Connection with an Organisation

You are connected with a company, partnership or other organisation if you or a family member, or

close connection:

- are employed by the company, either directly or as a subcontractor or agent
- are a Director, Owner, Board Member, Trustee, or have some other controlling or financial interest in the company
- hold shares in the company or have some other financial stake or interest in its success
- Or if there is some other connection or link that a reasonable person could take to create a conflict of interest