



Group Policy: Code of Conduct

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Approval Body	Group Audit & Risk Committee
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Scope

This is a Group policy and therefore applies to Staff, Board and Committee Members of the RCH Group of companies. As at September 2019, the RCH Group consists of River Clyde Homes and its subsidiary Home Fix Scotland Ltd.

Why a Code is Necessary

The Board has responsibility for all actions carried out by Staff, Involved Customers and Board Members. This includes responsibility for large sums of public and private money and the housing care of large numbers of people. Therefore, the Board is determined that the conduct of Staff, Involved Customers and Board Members should give Customers and funders confidence that the RCH Group is committed to maintaining high standards of conduct in all areas of its activities.

The Board believes that Staff, Involved Customers and Board Members, as well as partners and funders, want to be associated with an organisation that publicises and upholds its values. This 'Code of Conduct' (the "Code") has been drafted to meet the requirements of the Housing Act (Scotland) 2010, fulfil the expectations of the Scottish Housing Regulator ("SHR") and meet the key requirements of the sector Codes of Conduct. The RCH Group expects the spirit as well as the wording of the Code to be upheld and is relying on Board Members, Staff and Involved Customers to make a judgement on what is right and proper in any particular situation.

The term 'we' has been used throughout to show that the Code applies to all Board Members, Staff and Involved Customers.

The Code is not exhaustive, and it should be remembered that all Board Members, Staff and Involved Customers are responsible for ensuring that their conduct at all times meets the high standards that the sector is recognised for upholding. As well as observing the detail of the Code, you should apply its intention and spirit to all situations.

You are required to sign acceptance of this Code of Conduct and the "Agreement to abide by the RCH Group Code of Conduct" together with the "Disclosure of Interest - Declaration Form" both of which are attached as Appendix 1 to this document.

Terminology

- Board – includes the RCH Board, Subsidiary Board(s) and Sub Committees.
- Board Member – includes Members of the RCH Board, Subsidiary Board(s) and Sub Committees. It includes co-optees, Executive Directors and any other nominee whether or not they enjoy voting rights.

- ‘Staff Member’ and ‘Staff’ – includes the RCH Group paid staff and any other persons fulfilling the role of a paid employee, such as those employed by an agency or on secondment from another organisation.
- Customers – includes residents, tenants, factored owners and users of other services provided by the RCH Group.
- Involved Customer – are those Involved in delivering or scrutinising the RCH Group’s business activities. It does not include – as they are covered elsewhere – customers who are also members of the RCH Board, the Subsidiary Board or Sub Committees.
- Contractors – includes those other than Board Members, Staff and Involved Customers, who are directly Involved in delivering the RCH Group’s business activities. This includes contractors, sub-contractors, consultants and agents.
- ‘Closely connected’ – someone closely connected to you includes family members and persons who might reasonably be regarded as similar to family members even where there is no relationship by birth or law.
- Connection with an organisation – someone is connected with a company, partnership or other organisation if he or she, or a family member, or close connection:
 - Is employed by the organisation, either directly or as a sub-contractor or agent;
 - Is a director, owner, Board Member, trustee or has some other controlling or financial interest in the organisation;
 - Holds shares in the organisation, or has 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.

Main Principles of the Code

A. Probity: The RCH Group of companies must maintain the highest standards of probity and conduct.

B. Loyalty and Conflict of Interests: The RCH Group must ensure that its Board Members, Staff and Involved Customers act, and are seen to act, wholly in the interests of the organisation and its Customers. All actual or potential conflicts or dualities of interest must be openly declared and properly resolved.

C. Remuneration: Remuneration decisions must be lawful, transparent, fair and proportionate.

D. Personal Benefit: The RCH Group must demonstrate that Board Members, Staff and Involved Customers, and those they are closely connected to, receive no preferential treatment in the provision of benefits such as housing accommodation or employment.

E. Prevention of Bribery and Corruption: The RCH Group must adopt and comply with appropriate policies and procedures to prevent bribery and corruption.

F. Respect: The RCH Group must adopt and promote standards to ensure that the conduct of Board Members, Staff and Involved Customers at meetings, events, and in the workplace demonstrates respect for all and promotes the values of the organisation.

The RCH Group of companies will inevitably face situations not directly addressed by the Code. In these situations, the RCH Group should be guided by the seven principles of public life established by the Nolan Committee on Standards in Public Life:

- **Selflessness:** Act solely in terms of the organisation's, and its customers, interest and not seek to gain financial or other benefits for themselves, their family or friends.
- **Integrity:** Not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their duties.
- **Objectivity:** In carrying out your duties to make choices based wholly on merit.
- **Accountability:** Take responsibility for your actions and be prepared to explain them and submit them to appropriate scrutiny.
- **Openness:** Be as open as possible about decisions and actions taken. Give clear reasons for decisions and restrict information only when the wider public interest clearly demands it.
- **Honesty:** Declare any interests relating to duties and take steps to resolve any conflicts arising in a way that protects the organisations interests.
- **Leadership:** Support and promote the organisation's, and its customers, principles and values by leadership and example.

Main Elements of the Code

- A** General Responsibilities
- B** Conflicts of Interest
- C** Bribery, Gifts and Hospitality

- D Funds and Resources
- E Confidentiality
- F Respect for Others
- G Relationship between Board Members, Staff and Involved Customers
- H Relationship with Residents and Other Involved Users
- I Health, Safety and Security
- J Conduct at Meetings
- K Representing the Organisation
- L Learning and Development
- M Reporting Concerns

A: General Responsibilities

Main principle: You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the interest of the RCH Group of companies and their Customers.

1. You must comply with the law, your terms of appointment as an employee, Board Member or customer representative, and the RCH Group's policies and procedures relating to your role.
2. You must not act in a way that would bring the RCH Group into disrepute. This includes membership or involvement with organisations whose values are inconsistent with the RCH's values.
3. You must not bring the RCH Group's name into disrepute or affect its integrity by your actions or words, either within the RCH Group companies or outside. This includes the use of social networking sites.
4. You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.
5. You must not act outside the RCH Group's established procedures in any matter concerning customers.
6. 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.

7. You must accept the principle of collective decision making. This means that once the Board or customer forum has made a decision, you must support that decision.
8. You must not engage in campaigning activity that might compromise the position of the RCH Group.

B. Conflicts of Interest

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

Declaration of interests

Board Members, Staff and Involved Customers must ensure that their private or personal interests do not influence decisions and that they do not use their position to obtain personal gain or benefit of any sort, either for themselves directly, or for their families, friends or close associates. They should adhere to the RCH Group Policy on Entitlements, Payments and Benefits and declare all interests in line with this policy.

- You must comply with the RCH Group's 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.
- You must ensure that your entry in the RCH Group's "Register of Interests" is complete, accurate and up to date.
- You must comply with the RCH Group's 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 connected.
- You must not be Involved in the appointment of staff where you are related, or closely connected, to an applicant. You must declare any such relationship to the appropriate person. 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.
- In line with the RCH Group's Entitlements, Payments and Benefits Policy, as well as considering your own actions, you must be aware of the potential risk created by the actions of people to whom you are closely connected. Who you should consider, and our expectations of you to identify and declare such actions are outlined in the table below:

Group	Required Response
<p>1. Members of your household This includes:</p> <ul style="list-style-type: none"> • Anyone who normally lives as part of your household (whether related to you or otherwise) • Those who are part of your household but work or study away from home 	<p>We expect you to be aware of and declare any relevant actions of all people in your household. You must take steps to identify, declare and manage these.</p>
<p>2. Partner, Relatives and friends This includes:</p> <ul style="list-style-type: none"> • Your partner (if not part of household) • Your relatives and their partners • Your partner's close relatives (i.e. parent, child, brother or sister) • Your close friends • Anyone you are dependent upon or who is dependent upon you • Acquaintances (such as neighbours, someone you know socially or business contacts/associates) 	<p>Where you have a close connection and are in regular contact with anyone within this group, we expect you to be aware of and declare any relevant actions. Under these circumstances, you must take steps to identify, declare and manage these actions.</p> <p>Where you do not have a close connection and regular contact with someone in this group, we do not expect you to be aware of or to go to unreasonable lengths to identify any relevant actions. However, if you happen to become aware of relevant actions by such individuals, then these should be declared and managed as soon as possible.</p>

What You Need to Consider

The following are examples of the relevant actions /involvement by those to whom you are closely connected that you should consider, declare and manage as per our expectations outlined in the table above:

- A significant interest in a company or supplier that we do business with. A significant interest means ownership (whole or part) or a substantial shareholding in a business that distributes profits but does not include where an individual has shares in large companies such as banks, utility companies or national corporations, i.e. where owning shares would not give the individual any significant influence over the activities of that organisation.

- Where the individual may benefit financially from a company with which we do business
- Involvement in the management of any company or supplier with which we do business
- Involvement in tendering for or the management of any contract for the provision of goods or services to us.
- Application for employment with us.
- Application to join the RCH Group Board or its Subsidiary Board
- Application to be a tenant or service user of the organisation
- If they are an existing tenant or service user of the organisation
- Where the individual becomes a factored owner

Use of Our Contractors and Suppliers

In order to help us maintain our excellent reputation, where possible you should avoid using the RCH Group's contractors/suppliers for your own personal purposes. The contractors and suppliers that fall under the terms of this policy can be obtained from the Procurement Team.

We recognise that there could be certain circumstances where it might not be possible for you to avoid the use of all the contractors/suppliers on this list, such as where market conditions in your local area make it difficult to obtain a reasonable selection of potential contractors or suppliers. Under such circumstances you could be permitted to use those contractors/suppliers provided you are able to demonstrate that you received no preferential treatment in terms of price, quality or any other aspect of service delivery due to your involvement with us.

Approval to use those contractors is at the discretion of the Governance Team (in accordance with our scheme of delegation). In order to be granted approval, you will be required to demonstrate that there is no reasonable alternative contractor/supplier providing the service required in your local area, and that you will receive no preferential treatment in terms of service or cost (which you will be required to demonstrate through quotations and receipts)

If you are looking to purchase goods or services from any contractor/supplier on this list, then you must make a declaration in the Disclosure of Interest Register outlining:

- That you have received approval from the Governance Team prior to the commencement of works

- That you received no preferential treatment in terms of service or cost (which you will be required to demonstrate through quotations and receipts).
- Where you inadvertently use a contractor on the list in an emergency situation, you must notify the Governance Team as quickly as possible thereafter and enter an appropriate declaration in the Disclosure of Interests Register.

Any contractor/supplier not included on the list given by the Procurement Team can be used without the need for any declaration/further action. The contractor/supplier list held by the Procurement Team represents the majority of the contractors/suppliers that we use, but does not include any of our contractors/suppliers that:

- Only provide services of a small value (e.g. local window cleaners or sandwich shops) or
- Have such a large national or local standing that no favour could ever realistically be gained (e.g. utilities, BT, banks or national chains)

C. Bribery, Gifts and Hospitality

Main Principle: You must not offer, seek or accept bribes or inducements to act improperly or corruptly. You must not seek or accept gifts, hospitality or other benefits from individuals or organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisations.

- You must act, and be seen to act, wholly in the interests of the RCH Group, our residents and other service users. You should not benefit improperly from your position.
- You must not accept any offers of gifts or hospitality from individuals or organisations which might reasonably create, or be capable of creating, an impression of impropriety, influence, or place you under any obligation to these individuals or organisations.
- You must comply with the law and the RCH Group's policies and procedures in relation to:
 - Fraud, Bribery and Corruption
 - The giving, receipt, approval and recording of gifts and hospitality
- You must not canvass or seek gifts or hospitality or other benefits.

- You, or someone closely connected to you, cannot as a result of your role with us, receive preferential treatment relating to any services provided by the RCH Group or its contractors/suppliers, and you should be able to demonstrate this.

D. Funds and Resources

Main principle: You must not misuse the RCH Group's funds and resources. All property belonging to the RCH Group can only be used for business purposes unless explicit consent is given. This includes physical property, the business premises and intellectual property. No Board Member, Staff or Involved Customers or any of his/her close relatives should gain personally through payments and benefits from the RCH Group of companies, except as allowed by the RCH Group policy, the law, this Code and any associated guidance issued from time to time by the SHR.

- You must comply with the RCH Group's policies and procedures regarding the use of its funds and resources. 'Resources' includes staff, information, telephone, computer and other ICT facilities, equipment, stationery and transport.
- You must ensure that the organisational funds and resources entrusted to you are used efficiently, economically and effectively.
- You must comply with the RCH Group policies and procedures regarding procurement, ensuring value for money and fairness in decision making.
- You must take reasonable measures to protect the RCH Group's funds, resources, property and assets from theft, damage and misuse.
- You must comply with the RCH Group's policies and procedures relating to the acceptable or unacceptable use of email, intranet and internet services.
- You must claim reimbursement only for expenditure that was properly and reasonably incurred in carrying official RCH Group business. You must ensure that any expenses claim you make is accurate and complies with the RCH Group's policies and procedures

Board Members

- Board Members have a duty to make any payment due in terms of rental charge or other service charge to River Clyde Homes in good time and in line with agreed arrangements and the Board Membership Policy.
- Executive members of the governing body should not receive any additional payment for their governing body role over and above what they are entitled to under their contract of employment.

Staff

- Staff have a duty to make any payment due in terms of rental charge or other service charge to River Clyde Homes in good time and in line with agreed arrangements. Failure to do so will result in disciplinary action being taken.
- Upon leaving the RCH Group of companies, any staff member with outstanding rental or services charges owed to RCH, will have the amount deducted from their final remuneration package.

E. Confidentiality

Main principle: You must handle information in accordance with the law and the RCH Group's policies and procedures.

- You must comply with the provisions of the Data Protection Act 2018 which governs the protection of personal data. All personal data held about Customers, Staff and others, whether on paper or electronically is subject to the provisions of the Act. The RCH Group's policies and procedures provide further guidance.
- You must not disclose without authority any confidential business information. This duty continues to apply after you have left the RCH Group of companies or relinquished your position.
- You must not, without permission, pass or distribute to the press or media or any other external recipient(s) information or material relating to the RCH Group.
- In your capacity as a Board or Staff Member or Involved customer, you must not, without prior authority:
 - Appear to represent the views or position of the RCH Group;
 - Write letters to the press or other recipient(s);
 - Write media articles, blog posts or tweets etc., about the RCH Group and its activities;
 - Make comments or statements to the media; if approached, you must pass the enquiry to the Communications & Marketing Team
- You must not prevent another person from gaining access to information to which they are entitled by law.
- You must comply with the RCH Group's policies, procedures and protocols relating to communications and use of social media.

F. Respect for Others

Main principle: You must treat others with respect at all times.

- You must comply with the law and with the RCH Group's 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, sex and sexual orientation and impose positive duties to eliminate unlawful discrimination and promote equality. The RCH Group's policies and procedures provide further guidance and should be followed.
- You must not harass, bully or attempt to intimidate any person. The RCH Group's policies and procedures on Grievance & Dignity at Work provide further guidance and should be followed.
- You must not display materials in the workplace which other people might reasonably find offensive or use language which Board, work colleagues or Customers might reasonably find offensive.

G. Relationship between Board Members, Staff and Involved Customers

Main principle: Board Members, Staff and Involved Customers must maintain a constructive, professional relationship based on sound understanding of their respective roles.

Board Members

- You have a duty of loyalty and support towards the RCH Group of companies and this must be reflected in a constructive, professional relationship with staff.
- You must not go beyond your remit and become inappropriately Involved in operational matters.
- 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 RCH Group.
- 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 the future, and not at criticising individuals. Any concerns about the performance of individuals must be discussed in confidence with the Chair of the RCH Group Board, Committee or Chief Executive.
- You must avoid inappropriate personal familiarity with members of staff.
- You must not ask or encourage members of sStaff to act in any way which would conflict with compliance with this code or the RCH Group's policies or procedures.

Staff

- If your work brings you into contact with the RCH Group Board (River Clyde Homes and Home Fix Scotland), Committees or Involved Customer Groups, you must:
 - Take direction from the Board, or in accordance with any delegated authority of a Committee or an Involved Customer Group;
 - Respond constructively to questioning or challenge;
 - Respond willingly to requests for information.
- You must avoid inappropriate personal familiarity with Board Members or Involved Customers.
- You must not use informal channels to lobby or influence Board Members or Involved Customers on matters of the RCH Group business.
- You must not knowingly mislead the Board, Committees or Involved Customer Groups.
- In presenting information, you must set out the facts and relevant issues truthfully.

Involved Customers

- You must not seek to instruct or direct a member of staff or contractor. All instructions must be conveyed by the relevant member of staff.

H. Relationship with Customers and Other Service Users

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

- You must treat all customers and service users with courtesy and respect.
- You must not allow any personal relationship with a customer or other service user to conflict with your role and responsibilities.
- You must not give gifts or loans of money to or receive loans or gifts of money from customers or other service users.
- You must take great care in handling customers' and other service users' money, ensuring that a receipt is completed for every transaction.
- 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.
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- When handling information relating to residents and other service users, you must comply with the law and the RCH Group's policies and procedures relating to the protection of personal data.

I. Health, Safety and Security

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

- You must comply with the RCH Group's policies and procedures and bring to the attention of the appropriate person any risk to yourself or others. In particular:
 - Where you are provided with protective clothing this must be worn; and
 - For your own safety, you must comply with the RCH Group's policies and procedures relating to lone working
- You must comply with the law and the RCH Group's policies and procedures on smoking and on the use of alcohol, illegal drugs and other substances.
- You must comply with the RCH Group's policies and procedures relating to the security of the premises.
- Induction and update training on health and safety is mandatory for Board Members, Staff and Involved Customers.

J. Conduct at Meetings

Main principle: Your conduct at meetings must show respect for all and comply with the RCH Group's standards.

The RCH Group of companies expects Board Members, Staff and Involved Customers to meet the RCH Group standard of behaviour in meetings:

- You must be courteous to all other attendees and respect the position of the meeting Chair.
- You must not use threatening or aggressive behaviour, or act in a disruptive way.
- You must not attend meetings whilst intoxicated or under the influence of drugs.
- Once a Board, Committee or panel meeting has properly reached a decision, you must share responsibility for that decision, even where you had not supported it.

K. Representing the RCH Group

Main principle: In representing the RCH Group of companies at external events and in dealings with outside bodies, you are an ambassador for the RCH Group and must hold and promote its values, objectives and policies.

- You must not become involved in or be seen to endorse, any activity that may bring the RCH Group into disrepute. This includes but is not limited to illegal, immoral, racist or other discriminatory activity.
- In engaging activities which promote the work of the RCH Group to the outside world, you must demonstrate commitment to the RCH Group and support for its values, policies and goals.
- In representing the RCH Group at formal or informal events, you must be appropriately dressed for the occasion.
- You must follow the policy, procedures and guidelines on membership of any organisation that could bring the RCH Group into disrepute.

L. Learning and Development

Main principle: In partnership with the RCH Group of companies, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

- Board Members, Staff and Involved Customers are expected to participate in the assessment of their performance, and to provide and accept structured feedback, with a view to continually improving contribution and performance.
- You will be expected to support your personal development plan and meet the objectives and targets set for you as a result of the performance assessment process.
- Unless there are exceptional reasons, you must attend all learning and development events, either for you alone or as part of a group.
- Certain training is mandatory, and you will be obliged to take part. An example of this would be training relating to equality and diversity and health and safety.

M. Reporting Concerns and Breaches of the Code

Main principle: You must report to a member of the RCH Group Senior Management Team any reasonable and honest suspicions you may have about possible wrongdoing or breaches of the Code.

- If you are aware of potentially dishonest or fraudulent activity, or material breaches of this Code, you must report it to a member of the RCH Group Senior Management Team.
- The RCH Group's policies and procedures relating to fraud, bribery and confidential reporting (Whistleblowing) provide further guidance and should be followed.
- If you believe that you are being required to act in a way which conflicts with this Code, you must report it to a member of the RCH Group Senior Management Team.
- You must not victimise any person who has used or intends to use or is suspected of having used, the RCH Group's confidential reporting procedures to report the misconduct, or alleged misconduct, of others.

Guidance for Board Members

Where a Board Member breaches the Code, then the matter will be referred to the Chair of the RCH Group Board. In the first instance, the matter will be dealt with informally and confidentially between the Chair and the Board Member. Should this fail, or should the matter be more serious, then the Chair will nominate a Panel consisting of Board Members/Group Remuneration & Nominations Committee Members to investigate the matter. An external and independent advisor/investigator can be appointed by the Panel. On completion of the investigation, the Panel will recommend steps to be taken.

Guidance for Staff

Where staff breach the Code, then it will be dealt with according to the RCH's Disciplinary, Capability & Dismissal Policy.

Guidance for Involved Customers

Where an Involved Customer breaches the Code, the Chair of the Committee/Forum will take the same steps as the Chair of the RCH Group Board, with the support of relevant staff or an independent mentor.

Where the breach qualifies as a "notifiable event" to be reported to the Scottish Housing Regulator (SHR), then professional advice should be sought.

Review

This policy will be reviewed in its entirety every 3 years, unless an earlier review is required as a result of legal, regulatory or best practice requirements.

Context

Supporting Policies

The RCH Group Disciplinary, Capability & Dismissal Policy and Procedures

The RCH Group Grievance & Dignity at Work Policy and Procedures

The RCH Group Payments, Entitlements & Benefits Policy

The RCH Group Equalities & Diversity Policy

The RCH Group Scheme of Delegation

The Code of Governance

Customer Involvement Strategy

Ownership and Responsibility for Implementation

The owner of this policy is Richard Turnock (Executive Director, Resources & Transformation).

Those responsible for implementing this policy are:

The Chair of the Remuneration & Nominations Committee or Board

The Chair of the Committees

The Chief Executive

The Directors of the Organisation

The Heads of Service of the Organisation

The Managers of the Organisation

Key Stakeholders

The Board, The Committees, Staff, Involved Customers, The Regulator

Related Legislation

Employment Act 2008

Equality Act 2010

Data Protection Act 2018

AGREEMENT TO ABIDE BY THE RCH GROUP CODE OF CONDUCT

I have read the Code and agree to abide by its principles. I also agree to uphold the spirit of the Code as well as its words.

Name:

Job/Role title:

Date:

Signed:

Line Manager / Chair:

DISCLOSURE OF INTEREST – DECLARATION FORM

This form should be completed annually. It allows a record to be kept of any actual or potential conflict of interest that may arise. Those completing this form should provide details of any interest in the box provided and on a separate sheet. Where a box does not apply, this should be noted on the form.

If you are in doubt as to whether an interest needs to be declared, please discuss as follows:

- Board Members - speak to the Chief Executive
- Staff - speak to the line manager
- Involved Customers - speak to the Governance Team

The form and declaration must be signed and dated.

Declaration by Board Member / Staff / Involved Customer

.....

I acknowledge that a Disclosure of Interests Register summarising any interests that I may have declared in terms of River Clyde Homes' Code of Conduct and associated policies will be publicly available. By signing below, I

- (a) consent to the use and disclosure of such information in this way and
- (b) acknowledge and agree that, with regard to any information I supply before making disclosure I have obtained (and in respect of future disclosures, I will obtain) all necessary consents from those others to the use and public disclosure of their information.

Signed

.....

Date

.....

Group Policy: Code of Conduct

Name	
Designation	
Have you read, and do you understand, the RCH Group policy on Payments, Entitlements and Benefits?	
Please provide details of any firm or business in which you or someone closely connected to you has a shareholding interest or are directly concerned in the management of the business or are a principal proprietor.	
Please provide details of involvement with any Third Sector Organisation.	
Please provide details of any land or buildings owned by you within any areas that could be affected by River Clyde Homes' development programme.	
Please provide details of any position of public responsibility, including as an elected Member on the local authority or a community council.	
Please provide details of membership/ governing body Membership of another Registered Social Landlord.	
Are you or someone closely connected to you a tenant of, sharing owner of or factored by River Clyde Homes? Please provide details.	
Are you or someone closely connected to you employed by an organisation that is likely to be used by the RCH Group of companies? Please provide details.	

Group Policy: Code of Conduct

Are you related to, or in a relationship with, any Board Member of the RCH Group of companies or any employee of the RCH Group of companies? Please provide details.	
Do you carry out any voluntary or charity work for another organisation with a base in the Inverclyde Council area? Please provide details.	
Do you have any other interest(s) which could impact on your membership of the RCH Group Board(s) / employment with the RCH Group of companies / membership of the RCH Involved Customers group? Please provide details.	
Signed	
Date	
Line Manager / Chair	