



ATRIUM GROUP

Code of Conduct for Staff

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or earlier if SHR/ SFHA issue updated guidance

Responsible Officer:

Chief Executive

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The Atrium Group (Atrium) comprises **Atrium Homes** a Registered Social Landlord with charitable status, and **Atrium Initiatives** a wholly owned commercial subsidiary.

Introduction

There are references throughout this Code of Conduct (the Code) to 'I' and 'you' which means the member of staff of the Atrium Group who has signed this Code. References to 'we', 'us' and 'our' can refer to both or either Atrium Homes or Atrium Initiatives

1. Atrium attaches the greatest importance to ensuring that high standards of behaviour are demonstrated by all of our people and in all of our activities.
2. This Code of Conduct sets out the standards of conduct required of you as a member of our staff. You are required to observe these standards in all the activities that you undertake in connection with your employment with us
3. As a Registered Social Landlord (RSL), we are required to adopt and comply with an appropriate Code of Conduct¹. This Code is based on the Model Code of Conduct produced by the Scottish Federation of Housing Associations and Employers in Voluntary Housing (EVH) which the Scottish Housing Regulator (SHR) has confirmed fully complies with its Regulatory Standards. We have determined that this Code of Conduct should also apply to staff members of Atrium Initiatives.
4. You must make yourself familiar with the terms of this Code and act in accordance with its requirements at all times. You are required to sign the Code (in the 'Statement of the Acceptance' on page 10) to confirm that you have read and understood the terms of the Code and you have a personal responsibility to uphold the requirements of this Code.
5. You must also ensure you are familiar with, and comply with, all of our policies.
6. If there are any aspects of this Code, or of any of the related policies, on which you are unclear, you must seek guidance from your manager. Your manager will also be able to give guidance where you are unsure how the Code or related policies apply in a particular situation.
7. This Code of Conduct was adopted by the Governing Body on 28 March 2023.

Who this Code applies to

8. This Code of Conduct applies to everyone who works for us whether employed directly or otherwise.
9. A copy of this Code will be given to every person that it applies to.

¹ Scottish Housing Regulator (2019) Regulatory Framework, [Regulatory Standard 5.2](#)

How the Code is structured

10. The Code is based on the Nolan Principles on Standards in Public Life³ which are recognised as defining good conduct for those who work for the public using public money.
11. We have defined three groups of principles as the basis for the Code:
 - A [Honesty and Integrity p4-5](#)
 - B [Openness and Accountability p6-7](#)
 - C [Selflessness, Objectivity, Leadership p8-9](#)
12. Each of the three sections begins with a statement of principle. This is followed by a number of provisions which set out the requirements of the Code in more detail.

The Code is not exhaustive and it should be remembered that all staff working for RSLs are responsible for ensuring that their conduct at all times meets the high standards that the RSL sector is recognised for upholding. As well as observing the detail of the Code, you should apply its intention and spirit to all situations in employment.

You are required to sign the Statement of Acceptance at the conclusion of this code on page 10 which also outlines the implications for any breach of the code.

³ Committee for Standards in Public Life (May 1995), [Nolan Principles](#)

The Code of Conduct

A. Honesty and Integrity: You must act at all times with honesty and integrity. You must not use, or seek to use, your position to gain financial or other benefit for yourself, your family or friends.

Gifts and hospitality

- A.1** I will act, and ensure I am seen to act, wholly in the interests of our organisation, our residents in our communities and other service users. I will ensure that I do not benefit improperly from your position.
- A.2** I will 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 or influence, or place me under an obligation to these individuals or organisations. I will comply with Atrium’s policy on the matter.

Prevention of bribery

- A.3** We must comply with anti-bribery legislation. I will comply with our anti-bribery and corruption policies.
- A.4** We forbid all forms of bribery - meaning a financial or other advantage or inducement intended to persuade someone to perform improperly any function or activity. I will not offer, seek or accept bribes or other inducements from any individual or organisation and I will comply with our policy on bribery. Offering, seeking or accepting bribes or other inducements will result in disciplinary action and may also result in criminal prosecution.
- A.5** I will report to my manager any instances of suspected bribery or corruption within the organisation or any external organisation with which we have dealings.

Personal benefit

- A.6** I recognise that neither I, nor someone closely connected to me, can as a result of my role with Atrium receive preferential treatment relating to any services provided by the organisation or its contractors/suppliers. I will ensure that I can demonstrate this.
- A.7** I will not use, or seek to use, my position to promote my personal interests or those of any person with whom I am closely connected, or the interests of any business or other organisation with which I have a connection. (Appendix 1 defines what is meant by 'closely connected').

Resources, facilities and premises

- A.8** I will only use Atrium’s resources, facilities and premises for the purposes intended and in a responsible and lawful manner. This includes office premises, telephone, computer and other IT facilities, equipment, stationery, transport and staff.

Reasonable personal use of office telephones and computers and company mobile

telephones is permitted but must be kept to a minimum. Our Internet Controls Policy gives further information including what is meant by 'reasonable personal use'.

A.9 I will comply with all of our relevant policies, including (but not exclusively) usage of internet & email social media, health & safety, equalities, human rights and diversity and dignity at work.

A.10 I will not undertake work for another organisation - or for any personal business - on Atrium's premises nor use our resources or facilities for such a purpose, unless I first have specific permission from your line manager.

Funds and expenses

A.11 I recognise that Atrium's funds must be safeguarded from abuse, theft or waste. At all times, I will apply and observe all of our financial regulations and internal controls.

A.12 I will comply with our relevant policies when procuring goods/services or claiming expenses.

Tenants/service users and money

A.13 As a general rule, in relation to tenants and service users I will not:

- Give or loan them money
- Receive a gift or loan of money from them
- Invite or influence them to make a will or trust under which I am named as executor, trustee or beneficiary.

General responsibilities

A.14 I will not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests.

I am aware that under the Equality Act 2010, the following nine characteristics are specifically protected: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

A.15 In presenting information I will take all reasonable steps to ensure that I set out the facts and relevant issues truthfully.

A.16 I will avoid any situation that could give rise to suspicion of or suggest improper conduct.

A.17 I will inform my manager if I am notified of any action by a professional body that is relevant to my role with Atrium and/or which could impact Atrium's reputation that I am or may be party to

B. Openness and Accountability: You must declare all relevant personal interests. You must handle information in accordance with our policies and procedures. You must report to the appropriate senior person within Atrium any reasonable and honest suspicions you may have about possible wrongdoing.

Declaring interests

- B.1** I recognise that Atrium must ensure that no conflict arises, or could reasonably be perceived to arise, between my duties and my personal interests, financial or otherwise. I will declare, and manage openly and appropriately, any actual or potential interests or conflicts.
- B.2** Where I have a personal, business or financial interest in any matter that is relevant to Atrium's activities or is being considered (or is likely to be considered), or I know that someone to whom I am closely connected has such an interest, I will declare it promptly and record it in the Register of Interests.
- B.3** I will keep my entry in the Register of Interests complete, accurate and up to date.

Handling information

- B.4** I will observe and uphold the legal requirements and our policies in respect of the storage and handling of information, including personal and financial information. Our Privacy Policy gives further guidance.
- B.5** I will respond to requests for information positively and will not prevent people or bodies from being provided with information that they are entitled to receive.
- B.6** I will not use confidential information acquired through my work as one of our employees for my private interests or any other purpose for which it is not intended.

Respecting confidentiality

- B.7** I will respect confidentiality and ensure that you do not disclose information to anyone who is not entitled to receive it, both whilst I am a member of staff and after I have left employment at Atrium.
- B.8** Unless specifically authorised to do so, I will not make comments or statements in public or to the media or on social media sites, or pass any documents or other information to the press or media about us or our activities. I will pass any such enquiries to the Chief Executive quickly.
- B.9** I will not publish any material or deliver any lecture or address any issues relating specifically to us or our activities without prior approval. This includes invitations to speak at conferences or external events.

Using social media

- B.10** I will not disclose any private or confidential information relating to us, our customers, partners, suppliers, board members, or employees on any social networking sites, bulletin boards, blogs or similar. (See also **C12** under “**Upholding our reputation**”). This applies whether I am posting under my own name or a pseudonym.

Reporting concerns

- B.11** If I become aware of any actual or potential fraud, corruption or wrongdoing, or breaches of this Code, I will report this to my manager or to the Chief Executive. I am aware that I may do so on a confidential basis. Our Whistleblowing Policy gives further information.
- B.12** I will not victimise any person who has used - or intends to use, or is suspected of having used - our confidential reporting or whistleblowing procedures to report any actual or alleged fraud, corruption or wrongdoing by others.

C. Selflessness, Objectivity and Leadership: You must act in the best interests of Atrium at all times within the framework set by the organisation, working to promote our aims and objectives, upholding our values and setting a good example by your own conduct.

Fulfilling your role

C.1 I will comply with the terms of my appointment and our policies and procedures relating to my role.

C.2 I will fulfil my duties responsibly, exercising reasonable skill and care and acting at all times in Atrium's best interests and that of our tenants and other service users.

I will always aim to put the needs of Atrium's tenants and service users first in my day to day work, within the framework of our policies and procedures.

C.3 I will uphold and promote Atrium's values, aims and objectives and in accordance with the relevant legal and regulatory requirements (including those, as applicable, of the Scottish Housing Regulator and the Office of the Scottish Charity Regulator).

If I am in doubt as to the legal and regulatory requirements that are relevant to my role, I will seek guidance from my manager.

C.4 I will work at all times in accordance with Atrium's policies and procedures and not allow my own personal or political opinions to affect the way in which I carry out my duties. This does not impinge on my right to be an active citizen or, for example, to be an active trade unionist.

C.5 I will take direction from my line manager, other senior managers and the governing body, and exercise responsibly any authority that comes with my role as a staff member.

C.6 I will not seek to use informal channels to influence the governing body regarding decisions to be made about the conduct of our business.

C.7 I will consult my manager before taking on any outside work or any position (paid or unpaid) that will in any way impact on my role with Atrium. I recognise that any such work or position must not interfere with my existing job or conflict with Atrium's interests. Appendix 1 (p11-p14) gives more details on declaring interests.

C.8 I will participate in any necessary training, and play a constructive part in our performance appraisal process. I will contribute to the identification of any personal training needs I may have in order to keep my professional skills and knowledge up to date.

Working with tenants and other service users

C.9 I will maintain high standards of professionalism, fairness and courtesy in all my dealings with tenants and other service users.

- C.10** I will not allow any personal relationship with a tenant or other service user to conflict with the conduct of my role and responsibilities.
- C.11** I will use the appropriate channels for handling tenancy and service provision issues. I will not act outside our established procedures in any matter concerning any tenant or other service user.

Upholding our reputation

- C.12** I will not act in a way that could reasonably be regarded as bringing or risks bringing Atrium into disrepute. This would include publicly making any derogatory comments about the organisation, its staff, governing body members, service users, partners and anyone that we are doing business with.

I will discuss any grievance or concern that I have about a member of staff or of the governing body, with my line manager or with the Chief Executive.

- C.13** I will always be a positive ambassador for Atrium and our work, especially when attending events as a member of our staff or in dealing with outside bodies.

Showing respect for others

- C.14** I will always treat others with courtesy and respect . I will consider and respect the views of others.
- C.15** I will adhere to both the letter and the spirit of our equality and diversity policy. See also **A.14** about the need to avoid discrimination of any kind.
- C.16** I will always conduct myself in a courteous and professional manner. I will not, by my actions or behaviour, cause distress, alarm or offence.
- C.17** I will not harass, bully or attempt to intimidate any person.
- C.18** I will take care when displaying materials in the office, and ensure that these would not reasonably cause offence to colleagues.
- C.19** When attending meetings, I will be courteous to all attendees and respect the position of the meeting chair or convenor. I will also ensure that my mobile phone is switched off/on silent other than in very exceptional circumstances where it is necessary to take an urgent call.

Breach of the Code

As a member of staff you have a responsibility to promote and uphold the requirements of this Code and any other Code that your membership of a relevant professional body imposes. If you consider that you may have breached the Code, or have witnessed or become aware of a potential breach by another staff member, you should immediately bring the matter to the attention of your manager.

Any material breach of the Code will be considered under our disciplinary procedures and may result in a disciplinary action being taken, which may include dismissal.

As a member of staff you have a duty to co-operate with and contribute to any investigation relating to a potential breach of the Code or an associated matter.

You must sign the below statement of acceptance once you have read and understood this Code and its requirements.

Statement of Acceptance and Signature

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 staff member of Atrium Homes/Atrium Initiatives.

I confirm that I am aware that I must declare and manage any personal interests in accordance with our policy. I agree to review all relevant Registers regularly to ensure that all entries relating to me are accurate.

I understand that, if I am found to have breached any points mentioned in this Code of Conduct or acted against its spirit, action will be taken in accordance with Atrium Homes/Atrium Initiatives disciplinary procedures and could ultimately result in my dismissal.

Signed _____

Date _____

Declaring and Managing Personal Interests

1. Introduction

- 1.1 Being a staff member of Atrium is of course only one part of your life. Other aspects of your life - such as family, friends and neighbours, voluntary work, causes you support, possibly business or financial interests, possibly your own housing arrangements - may have the potential to cross over into your role as a staff member.
- 1.2 However, as we are an organisation that works for the community [and uses public funds], it is essential that there is no conflict - and that there can be no reasonable perception of conflict - between your duties as a member of staff and your personal (or personal business or financial) interests.
- 1.3 Any potential conflict between your position as a member of our staff and your other interests must be openly declared and effectively managed so as to protect the good reputation of Atrium and the RSL sector.
- 1.4 As stated in the Code (provision **B1 p6**) where you have a personal business or financial interest in any matter that is relevant to our activities or is being considered (or is likely to be considered), or you know that someone to whom you are closely connected has such an interest, you must declare it promptly and record it in the Register of Interests.
- 1.5 This Appendix gives further guidance on how to declare and manage any personal (including personal business or financial) interests.

2. Examples of interests that must be declared

- 2.1 The following are examples of the kind of interest that you must declare. Please note that this list is not exhaustive, and there may be other interests that you should also declare.
 - Tenancy of a property (by you or someone to whom you are closely connected) of which we are the landlord.
 - Occupancy or ownership of a property (by you or someone to whom you are closely connected) which is factored or receives property related services from us.
 - Receipt of care or support services from us.
 - Membership of a community or other voluntary organisation that is active in the area(s) we serve.
 - Voluntary work with another RSL or with an organisation that does, or is likely to do, business with us.
 - Membership of the governing body of another RSL.
 - Being an elected member of any local authority where we are active.

- If you purchase goods or services from us.
 - If you purchase goods or services from one of our contractors or suppliers.
 - Significant shareholding in a company that we do business with.
 - Membership of a political, campaigning or other body whose interests and/or activities may affect our work or activities.
 - Ownership of land or property in our areas of operation excluding for the purpose of your own residential use (i.e. there is no requirement for you to declare any house in which you currently live).
 - Unresolved dispute relating to the provision of services in connection with a tenancy or occupancy agreement or a contractual dispute over the provision of goods or services with us.
- 2.2 If you are not sure whether a certain matter needs to be declared, you must seek guidance from your manager. If doubt remains, the advice would always be to declare the matter.
- 2.3 You should note that in some circumstances, declaration of an interest may not be sufficient, and that it may be necessary for the organisation to take additional measures to deal satisfactorily with the situation so as to protect the probity and reputations of both yourself and the organisation.

3. Definition of 'close connection'

- 3.1 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.
- 3.2 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 Table A below:

Table A

| Group | Required Response |
|---|--|
| <p>1. Members of your household</p> <p>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> |

| Group | Required Response |
|---|---|
| <p>2. Partner, Relatives and friends</p> <p>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

3.3 The following are 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 Table A:

- 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 our Board or any of its subsidiaries
- Application to be a tenant or service user of the organisation
- If they are an existing tenant or service user of the organisation

4. Declaring personal interests

- 4.1 As a staff member you are required, on appointment, to complete a form to register any personal interests that could potentially conflict with your role and thereafter to complete a new form (or amend the existing form) whenever there is a material change. You will also be prompted annually to update the register.
- 4.2 As stated in the Code (provision **B2**), you must keep your entry in the Register of Interests up to date, add any new interests as soon as they arise, and amend existing interests as soon as any change takes effect.
- 4.3 A situation may arise where you are invited to be present at a meeting where a matter in which you have a personal (or a personal business or financial) interest is discussed. In such cases you must inform the meeting chair at the start of the meeting, or as soon as you become aware that this is the case. You would then be required to leave the meeting for the duration of the particular item. If in any doubt, you should ask the meeting chair or another senior person present for guidance. This applies to all meetings that you attend as a member of our staff – both internal and external.
- 4.5 Any failure to make a complete, accurate and prompt declaration - whether deliberately or through taking insufficient care - will be regarded as a breach of this Code.