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1. Introduction

Everyone who works for, or represents, Cornerstone must be held to the highest standards of conduct. This protects residents, Cornerstone, and the reputation of social housing.

This code sets standards appropriate for social housing providers. The National Housing Federation developed it. The code is for use by individual staff, board members and involved residents.

2. What is the Code of Conduct?

Simply put, the Code of Conduct sets out the behaviours, or standards of conduct, expected of people involved in a housing association's work or decision-making.

This code does not set out how Cornerstone should make decisions; it explains how individuals involved in making those decisions should behave.

The code does not prevent anyone from exercising their rights, and in fact encourages them to do so (as set out in section H). This includes residents' right to make complaints and the right of all involved to use Cornerstone's whistleblowing procedure.

3. How does it fit with other policies and procedures?

The code is intended to fit with our wider suite of policies and procedures, which set out how things happen at Cornerstone. It also sits alongside regulatory and legal expectations.

The code assumes that those using it will comply with all legal and regulatory requirements relevant to this code and with Cornerstone's policies, procedures and employment contracts.

Users of this code have access to all relevant policies and procedures, via our BrightHR system, SharePoint, or via our dedicated board portal. Policies are also matched with training courses within our IHASCO system. They are also covered in the induction of new colleagues.

4. Who does the code apply to?

It applies to board members, staff and involved residents.

Board members

The Code of Conduct sits alongside the NHF Code of Governance and sets out the standards of conduct required of board members.

Involved residents

The code is intended to apply to residents who have a formal role in Cornerstone's governance, scrutiny or decision-making arrangements, such as Resident Engagement Panel (scrutiny panel members), resident committee members or residents who attend board or committee meetings.

Staff

The code addresses the standards of behaviour expected of every member of staff. It sets out expectations for staff conduct in fulfilling their roles. This includes how individuals should behave towards residents.

5. Responsibilities of Cornerstone's Board

The Cornerstone Board is ultimately responsible for the organisation's actions, policies, and work. The Board must ensure that all those concerned comply with this code.

The Board and Executive Team are responsible for setting an appropriate framework of policies, delegations, and procedures. They must promote an organisational culture founded on openness, respect, and accountability to residents, and one that enables and supports all individuals to meet their responsibilities under this code.

Arrangements must be in place to enable people to ask for further information or guidance they may need about the application or detail of this code, including what should happen where there has been a failure to comply.

6. How the code is structured

There are five parts to the code:

- 1. Acting in the best interests of residents and Cornerstone.**
- 2. Behaving with integrity**
- 3. Treating others fairly, with respect and empathy**
- 4. Taking responsibility for the impact of your actions**

5. Acting with diligence and care

Each part of the code comprises a set of principles and detailed expectations. Where requirements apply differently to different groups (board members, involved residents and staff), we use subheadings within the relevant section to distinguish them.

These headings are marked with a colour-coded BM (board member), S (staff), IR (involved resident).

6. Application of the code

The code cannot cover every situation people may face while performing their roles.

Even where it does not contain specific requirements, you need to apply good judgement, using the principles of the code. For example, in any situation, consider how an action taken or decision made aligns with Cornerstone's purpose and values, and what impact it may have on residents and Cornerstone's reputation.

7. Compliance with the code

The code covers the conduct of individuals; the administrative burden of evidencing every individual's compliance would be disproportionate.

- There will be meaningful opportunities for residents to influence and scrutinise this code, along with any reviews to the code.
- The code will be presented to the board in full and a formal resolution recorded in relation to its adoption and any changes made to the code.
- Once the code has been adopted, it will be available on our website as well as BrightHR, SharePoint and our Board management system.
- It will be reviewed every 3 years to ensure it remains up-to-date and fit for purpose.
- Any concerns regarding compliance with the code can be recorded via our complaints procedure or via emails governance@cornerstonehousing.net
- Any alleged breaches will be addressed through our disciplinary, governance or complaints procedures.

8. Code of conduct

These headings are marked with a colour-coded **BM** (board member), **S** (staff), **IR** (involved resident).

Acting in the best interests of residents and Cornerstone

You have a responsibility to carry out your role in a way that supports the long-term interests of current and future residents and is in line with the purposes and values of Cornerstone.

A. Meeting your responsibilities

The principle

You must act in good faith, set aside personal gain, and make decisions that support the long-term interests of residents as a whole and are in the best interests of Cornerstone.

Expected of all **BM S IR**

A1 You must always try to fulfil the requirements of your role to the best of your ability. If any circumstances arise that limit your ability to meet your responsibilities, you must raise this through the appropriate channels.

A2 In carrying out your role, you must always seek to further Cornerstone's strategic objectives and reflect our desired culture.

A3 You must not act in a way that discriminates against, or unfairly favours, individuals, groups or interests, including on the basis of any protected characteristics they may have.

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

Expected of board members and involved residents **BM IR**

A5 You must respect and take responsibility for decisions that are made by the group(s) of which you are a member, even if you do not personally agree with them.

Expected of staff members **S**

A6 You must consult your manager before taking any other paid or voluntary work that may interfere with your ability to act in line with Cornerstone's purpose, or conflict with the terms set out in your contract of employment.

B. Representing Cornerstone

The principle

In representing Cornerstone in any capacity, including at external events, in dealings with outside bodies and on social media, you are an ambassador for Cornerstone and must uphold and promote its values, objectives and policies.

Expected of all BM S IR

B1 In representing Cornerstone, you must act in accordance with its values, policies and goals.

B2 You must not conduct yourself in a manner that could reasonably be regarded as bringing Cornerstone into disrepute through dishonest, misleading or inappropriate behaviour.

B3 You must not make knowingly false, malicious or misleading statements about Cornerstone or those connected with it.

B4 You must not seek to officially represent the views or position of Cornerstone unless authorised to do so.

B5 When representing Cornerstone through any medium, including social media, you must at all times act with professionalism.

B6 Where any personal social media accounts refer to your role with Cornerstone, you must make it clear in what capacity you are communicating.

Expected of board members and staff BM S

B7 If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded as affecting Cornerstone, you must obtain appropriate prior consent from Cornerstone. Such consent must not be unreasonably withheld unless your activity poses a material risk to the association.

Behaving with integrity

By integrity, we mean that you must act honestly, transparently and in line with the highest standards of ethical conduct. Cornerstone's reputation and good name depend on compliance with this code and the laws, policies, and procedures it refers to.

C. Conflicts of interest

The principle

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

Expected of all BM S IR

C1 You must formally declare to Cornerstone, at the earliest opportunity, any interests, roles and relationships that could - or could reasonably be perceived to - affect your ability to act in the best interests of residents as a whole and of Cornerstone; you must make sure that these interests do not interfere with your ability to carry out your role effectively.

C2 You must declare any known relationship to a resident, potential resident or other customer of the association where this could reasonably be perceived to influence your role. You must not be involved in decisions relating to their relationship with Cornerstone or seek or accept preferential treatment for them.

C3 You must declare any known relationship to a member of staff or board member where this could reasonably be perceived to influence your role. You must not be involved in decisions relating to their relationship with Cornerstone or seek or accept preferential treatment for them.

C4 You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to the association and must not be involved in their appointment, performance management or reward.

C5 Except where specifically permitted, as set out in Cornerstone's relevant policy, you must avoid using its contractors and suppliers for private purposes.

C6 You must not use, or attempt to use, your position to secure personal benefit or advantage for yourself or any connected person, business or organisation.

C7 You must not seek to influence decisions improperly, including by applying pressure, offering inducements, or using personal relationships to secure preferential outcomes.

Expected of board and staff members BM S

C8 You must declare any known relationship to a person applying for or performing a role within Cornerstone and must not be involved in their appointment, performance management or reward.

Expected of board members and involved residents BM IR

C9 You must be clear about the role you are acting in and must not use your position to influence individual service decisions or treatment for yourself or others.

C10 You must act independently and fairly, avoiding involvement in individual operational matters unless this is part of an agreed role.

C11 Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to take all reasonable steps to address the conflict. These should include being willing to resign if the conflict is material or long-standing and, in the opinion of the relevant board, committee or

other group, cannot be managed appropriately. For residents, a conflict could include a matter being discussed that relates specifically to the individual's home. It should not prevent residents taking part in discussions about matters that affect larger groups of residents.

Expected of involved residents IR

C12 You must not be involved in any recruitment or selection process where you have a close connection with a person applying for the role.

D. Bribery, gifts and hospitality

The principle

In your role with Cornerstone, you must not allow gifts, hospitality or other benefits to influence, or be perceived to influence, your judgement or behaviour.

Expected of all BM S IR

D1 You must not seek or accept preferential treatment in the provision of benefits such as employment or housing accommodation.

D2 You must not solicit or seek gifts or hospitality or other benefits in connection with your role.

D3 Any gifts or hospitality offered to or by you must be either declared or declined according to your housing association's policies.

D4 If you are offered a bribe, hospitality or a gift, which is or may be in return for expected preferential treatment, you must decline and declare this immediately to the appropriate person.

Expected of involved residents IR

D5 You must not seek or accept preferential treatment in the provision of housing or related services.

E. Funds, resources and personal benefit

The principle

You must use Cornerstone's funds, resources and assets responsibly, transparently and only for proper purposes.

Expected of all BM S IR

E1 You must ensure that Cornerstone's funds and resources are used properly and efficiently.

E2 Your procurement decisions must be guided by Cornerstone's policies and fairness in decision-making and in line with relevant law.

E3 You must take all reasonable measures to protect Cornerstone's funds, resources, property and assets from fraud, theft, damage and misuse.

E4 If you claim reimbursement for any expenses, you must do so in line with Cornerstone's policies and procedures.

Expected of board members BM

E5 If you are making decisions about litigation, you must ensure that funds and resources are used properly and efficiently with consideration of financial, operational and reputational risk.

F. Confidentiality

The principle

You must handle information provided to you in your role responsibly and lawfully, balancing confidentiality, commercial sensitivity, and legal obligations with openness, transparency, and accountability.

Expected of all BM S IR

F1 You must not disclose, without the required permission and authority, any personal data about residents, staff or colleagues. This duty continues to apply after you have left Cornerstone or stepped down from your position.

F2 You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left Cornerstone or stepped down from your position.

F3 You must not, without authority, pass or distribute to the press or media or any other external recipient any unpublished information or materials relating to the association, unless you are doing so in accordance with Cornerstone's whistleblowing policy and procedure.

F4 You must not prevent another person from gaining access to information to which they are entitled by law and should support transparency where appropriate.

G. Working with residents

The principle

You must act fairly and properly in your dealings with residents, including listening to their views and being accountable for your actions.

Expected of all BM S IR

G1 You must seek and value views from residents when making decisions that will affect them.

G2 You must not allow any personal relationship with a resident to influence how you discharge your role and responsibilities.

G3 You must not give personal gifts or loans of money to or receive personal loans or gifts of money (including will bequests) from residents.

G4 You must handle residents' money only where necessary and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with the Cornerstones financial policies, procedures and controls to ensure appropriate handling of any and all funds.

G5 You must not invite or influence a resident to make a will or trust under which you are named as executor, trustee or beneficiary.

Expected of staff and board members BM S

G6 You must maintain appropriate boundaries with staff and residents and must not allow personal relationships to influence how you carry out your role.

Expected of involved residents IR

G7 When you advocate for issues, concerns or experiences raised by residents or communities, you must do so honestly and without seeking unfair advantage or preferential treatment.

H. Reporting concerns

The principle

You must report to the appropriate person within the organisation any reasonable suspicions you have about possible wrongdoing in line with this code or your organisation's relevant policies and procedures.

Expected of all BM S IR

H1 If you have a concern about possible wrongdoing, you must immediately report it via the appropriate internal channel or external body. This includes becoming aware of potentially dishonest or fraudulent activity, and material breaches of this code or relevant legislation, including health and safety.

H2 If you believe that you are being required to act in a way which conflicts with this code or legislation, you must immediately report it via the appropriate channel.

H3 You must not victimise, disadvantage or treat unfairly anyone who raises a concern, makes a complaint, or uses whistleblowing or reporting procedures in good faith.

Treating others fairly, with respect and empathy

How people behave towards each other is fundamentally important to the experience of Cornerstone residents and staff. Respectful, fair and empathetic behaviour is essential to building trust, maintaining effective relationships and supporting a healthy organisational culture.

I. Fairness, respect and empathy

The principle

You must treat all others with fairness, respect and empathy, regardless of role, status or circumstances. You must recognise where you have power and authority in your role and use it responsibly and, where possible, in a way that empowers other people.

Expected of all BM S IR

I1 You must treat everyone you engage with through your role with respect, politeness, consideration and empathy.

I2 You must respect individuals' chosen identities, backgrounds, protected characteristics and lived experiences, and avoid making assumptions about others.

I3 You must act in ways that contribute to an inclusive environment, where people feel fairly treated, respected and listened to and where they feel able to raise concerns.

I4 You must not harass, bully, intimidate or discriminate against others, or engage in behaviour, including subtle or repeated behaviours, that could reasonably make others feel marginalised, threatened, patronised or dismissed.

I5 You must not display materials in Cornerstone workplace or use language in the performance of your role which other people might reasonably find offensive.

I6 You must report through appropriate channels any instances of unfair or unequal treatment associated with Cornerstone and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and respecting confidentiality.

Expected of staff S

I7 If your role includes working in residents' homes, you must behave respectfully and with care, recognising that you are entering someone's home. This includes respect for people's privacy, preferences and personal property.

J. Professional relationships

The principle

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

Expected of all BM S IR

J1 You must not ask or encourage anyone to commit wrongdoing, including any breach of this code.

J2 You must behave in a professional manner appropriate to your role, always maintaining independence and integrity. You must conduct relationships with other people who hold roles at Cornerstone (whether involved residents, board members or staff) on an appropriately professional footing.

J3 You must challenge language or behaviours that reinforce stigma about residents or social housing.

J4 You must welcome constructive challenge and respectful disagreement from others and offer challenge to others in a constructive and respectful way.

Expected of board members BM

J5 Your relationships with staff and residents must be constructive and professional.

J6 You must set an example by demonstrating the highest standards of honesty and ethics and your alignment with the values, policies and objectives of Cornerstone.

Expected of board members and involved residents BM IR

J7 Where it is necessary to raise issues of staff, board or contractor performance, these must be raised constructively and through the appropriate channels.

J8 Unless you have specific and, where practicable, written delegated authority to do so, you must not individually give instruction or direction to any member of staff or contractor.

Expected of staff members S

J9 You must avoid, in a professional setting, inappropriate personal familiarity with board members and involved residents.

J10 You must not use informal channels to lobby or influence board members or involved residents on matters of Cornerstone's business.

J11 You must not knowingly mislead the board or any of Cornerstone's committees or panels. When presenting information, you must set out the facts, relevant issues, and risks truthfully.

Taking responsibility for the impact of your actions

While on Cornerstone's business, you are responsible for considering the immediate and longer-term impact of your actions and being accountable for them.

K. Resident experience

The principle

You must anticipate and take responsibility for the impact that your conduct, actions and decisions may have on residents.

Expected of staff S

K1 You must consider how your conduct, actions and decisions may impact on residents.

K2 You must be prepared and able to offer residents a clear explanation for actions or decisions you take, especially where these directly affect them.

K3 You must respond constructively to feedback about your actions, decisions and performance, whoever provides it.

L. Health, safety and wellbeing

The principle

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

Expected of all BM S IR

L1 You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk. When you take actions and make decisions, you must consider the impact your action or decision may have on the safety and wellbeing of others.

L2 If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or a group of individuals connected with the association, you must report this immediately through the appropriate channels.

M. Environment and sustainability

The principle

Within your role at the association, you must consider, and try to avoid or reduce, negative impacts on the environment and sustainability.

Expected of all BM S IR

M1 In carrying out actions or making decisions in the performance of your role, you must consider the environmental impact of your decisions and, where you are able, seek to achieve positive environmental outcomes.

M2 You must take reasonable steps to reduce unnecessary waste and resource use.

N. Digital and data

The principle

You must ensure that your use of digital systems, data and emerging technologies is responsible and protects residents, staff and Cornerstone itself from harm.

Expected of all BM S IR

N1 You must take reasonable steps to protect sensitive information from loss, misuse or unauthorised access.

N2 In carrying out your duties, you must use digital systems, devices and tools only in ways which are formally permitted by Cornerstone. You must report any suspected data breach, cyber security breach or concern, and any other digital threat or vulnerability. immediately through the appropriate channels.

N3 In using digital systems, data and emerging technologies within your role, you must take care to avoid use that may be misleading, discriminatory or otherwise inconsistent with Cornerstone's values and responsibilities.

N4 You should be transparent and proportionate in any permitted use of artificial intelligence and must take care to maintain human judgement and accountability in such use.

Acting with diligence and care

The diligence and care with which roles are performed significantly affect the quality of decision-making and services, and the experience of residents and staff. This includes taking responsibility for your own performance and for meeting relevant professional standards.

O. Learning and development

The principle

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

Expected of all **BM S IR**

O1 You must play an active part in Cornerstone's supervision and performance appraisal processes as they apply to your role.

O2 You must make personal training and development needs relevant to your role known to the organisation and must undertake all mandatory training for your role.

O3 Unless there are exceptional reasons, you must attend learning and development events as required and apply learning to your role.

Expected of board members **BM**

O4 You must keep your knowledge up-to-date in those areas in which you are a specialist, as well as keeping abreast of matters relating to your organisation and the wider sector(s) within which it operates.

Expected of staff members **S**

O5 You must take responsibility for your own professional development. Where your role requires continuing professional development (CPD), you must keep this up-to-date and maintain any required records.

P. Acting with care and diligence

The principle

You must act with care and diligence in making sure that you understand your role and its requirements, and that you are equipped to carry out your duties.

Expected of all **BM S IR**

P1 You must take care to understand the responsibilities of your role, including relevant legal, regulatory and policy requirements.

P2 You should prepare properly for any meetings, decisions and activities where you will be required to contribute views, to scrutinise or to make decisions.

P3 If you become aware of a problem where action is required, you must not ignore, conceal or minimise the issue.

P4 In carrying out your role, you should recognise the boundaries of your responsibilities and must escalate issues or risks as needed, particularly where these may impact residents, services, safety or the reputation of the organisation.

Q. Continuous improvement

The principle

You must support a culture of learning and continuous improvement through acting in an open and accountable manner, recognising mistakes and learning from feedback to help Cornerstone to continue to improve outcomes.

Expected of all **BM S IR**

Q1 You must demonstrate openness to learning from a range of opportunities, including resident scrutiny, complaints and other feedback.

Q2 You should offer open and constructive feedback to others and invite feedback about your own performance.

9. Jargon buster

This brief jargon buster addresses specific words and phrases used in the Code of Conduct.

Board

Includes any board of management, management committee, board of trustees, and all similar governing bodies however named.

Board member

Includes all members of governing bodies whether they are formally known as non-executive directors, trustees, board members, management committee members, etc. It includes co-optees and any other nominees, whether or not they enjoy voting rights, and all members of sub-committees who are not also members of the main governing body.

Close connections

In broad terms, means your family, relatives, close friends or business partners, as well as businesses in which you have an interest through ownership or influence. The

term includes (but is not limited to) your spouse, unmarried partner or civil partner, children, siblings, grandchildren and grandparents. If you are unsure, it is best to err on the side of caution by acknowledging that there may be a close connection and acting accordingly.

Contractors

Includes those other than board members, staff and involved residents who are directly involved in delivering Cornerstone's business activities. This includes contractors, sub-contractors, consultants and agents.

Culture

Organisational culture can be simply described as 'how we do things around here' - it's the sum total of shared values, attitudes and behaviours that shape how people perform their roles in a housing association and how residents experience the services they receive.

Housing association

Housing associations are independent, non-profit making, social landlords.

Impact on the environment and sustainability

This means the effect your actions or decisions may have on the natural environment. This includes climate change, carbon emissions, energy and water use, waste, pollution, biodiversity and the responsible use of resources.

Involved resident

Includes residents and other customers who are formally involved in delivering, or scrutinising, Cornerstones business activities.

Known relationship

For the purposes of this code, this means relatives and close connections (see definition above). Relationships with acquaintances i.e. people you know, but not very well, are not covered by this term.

Personal familiarity

For the purposes of this code, this refers to forming relationships that compromise, or could reasonably be perceived to compromise, professional boundaries, objectivity, independence of judgment or proper governance arrangements.

Professionalism

A set of behaviours which reflects the standards, skills, competencies and ethics associated with a role.

Protected characteristics

Distinguishing features or traits of groups and individuals which are protected under the law from discrimination and unfair treatment. The protected characteristics under

the Equality Act 2010 are age, gender reassignment, being married or in a civil partnership, being pregnant or on maternity leave, disability, race including colour, nationality, ethnic or national origin, religion or belief, sex and sexual orientation.

Residents

Throughout the code, we use the term 'residents' to include residents, tenants, leaseholders, shared owners and users of other services provided by Cornerstone.

Staff member and staff

Includes Cornerstones employees and any other persons fulfilling the role of a paid employee, such as those deemed to be workers, interim placements, or those on secondment from another organisation. This includes directly employed operatives working in areas including repairs and maintenance, grounds maintenance, communal cleaning and safety compliance.

Strategic objectives

Specific goals an organisation sets itself in order to achieve its strategy. These are the things the organisation plans to do to get from where it is now to where it would like to be in the future.