

Policy Name	Code of Conduct for Directors
Policy No.	003

1. Key Objective

To ensure that the Guernsey Housing Association Board conducts its affairs in an open and proper manner in order to maintain trust in the organisation and uphold its reputation, and that each of its members act with integrity and transparency.

2. Key Policy Standards

2.1 General

Directors (Board members) have an obligation to ensure that their private or personal interests do not influence their decisions or compromise their ability always to act with openness, honesty and transparency in the best interest of the GHA and those who it seeks to serve.

Directors must ensure that the Board has clear policies and procedures for its members to identify, declare, record and manage any actual, potential and perceived conflicts of interest

Directors must not use their position to obtain personal gain of any sort.

2.2 Declaration of Interest

Directors must:

- a) declare all interests that may relate to the activities of the GHA
- b) not receive any financial remuneration for their activities as a Director, other than reimbursement of reasonable travelling and/or out of pocket expenses properly incurred on GHA business
- c) ensure that any private or personal financial interest does not influence their decisions
- d) disclose any direct or indirect pecuniary or non-pecuniary interest in any contracts or business being considered by GHA and not vote and/or withdraw from a meeting whilst such matters are being considered and offer to resign where such a conflict is likely to recur on a frequent basis
- e) declare details of any relationship with any candidate for employment with GHA, to the Chief Executive. Such information shall be communicated to the Board before the appointment is made
- f) never allow themselves to be mandated by an outside body or other persons to support, resist or influence a Board decision.

GHA will maintain a register of member's interest which will be available for public inspection.

2.3 Confidentiality

Board members must treat as confidential all information in relation to the business, policy, organisation, management, future plans, development plans, clients, customers, tenants, and staff of GHA. Information must not be provided to third parties unless they are entitled to receive it.

2.4 Gifts and Hospitality

- a) Generally speaking, no gift of any value above the cost, for example, of company pens or notebooks may be accepted by a Director.
- b) If Directors are offered gifts and/or hospitality, as a result of their position at GHA, they should not place themselves under an obligation that might influence or be perceived to influence their future decisions or conduct.
- c) Directors should be cautious when accepting hospitality, ensuring that it is appropriate and not too lavish or too frequent. By way of a guideline, Directors should decline hospitality that GHA, as a charitable organisation, could not reasonably be expected to reciprocate. Directors should be careful that the receipt of hospitality could not be construed as a way of exerting improper influence over them or GHA.
- d) The following disclosures must be made by Directors in writing for inclusion in the Register of Interests;
 - Any invitation to a social function or other form of hospitality which they have accepted as a result of their involvement with GHA either from existing contractors, consultants, professional advisers, suppliers or any other firms seeking work with GHA.
 - Any interest which they or their close relatives may have in a company, firm or organisation involved in, or likely to be involved in business with GHA.
 - All gifts/hospitality, whether accepted or declined, need to be reported to the Company Secretary for recording.

2.5 Use of the Approved Contractors/Consultants

- 2.5.1 Contractors or consultants employed by GHA will occasionally be used by Directors in their personal capacity, as there is a limited choice of companies with certain skills in such a small island. It is recognised that this will be difficult to avoid. In this situation the Director or staff member must declare it, and it be noted on the Register of Interests, held in the GHA office. Any work should be arranged in advance, ideally quotes obtained and clearly recorded within the Register of Interests. If in doubt, and if the amounts involved are material, Directors should seek the advice of the Chief Executive. Normal industry costs should be paid and Directors and staff cannot gain financially.
- 2.5.2 Details of any use of GHA approved contractors/consultants by Directors will be recorded in the Register of Interests.

2.6 Confidential Reporting (Whistleblowing) and Complaints

- 2.6.1 GHA encourages both Directors and staff who may have serious concerns or complaints about any aspect of GHA's activities or service delivery to express those concerns. Directors should contact either the Chairman or the Chief Executive in the first instance.
- 2.6.2 Persons raising concerns will not be penalised in any way for doing so. Equally, abuse of the Policy will be treated as a serious disciplinary matter.

3. Media

All communication with the media should be discussed firstly with the Chief Executive and handled sensitively. If the matter is of a particularly sensitive nature then the Chairman (or in their absence as many of the other Directors as possible) should be consulted. Ideally the Chief Executive should deal with the media and any press releases. It is important that GHA speaks with one voice in a coordinated way hence channelling media contact through the Chief Executive is strongly preferred.

Approved – March 2021	Review – March 2023
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