Bromford Flagship LiveWest's Code of Conduct

This Code applies to Board[1] and Committee members[2], colleagues and involved customers[3].

[1]References to the Board in this document are as defined in the Governance Framework as the coterminous board acting as the board of each Group RP entity.

[2]References to Board members includes Independent co-opted Committee members

[3] References to involved customers are defined as A customer who participates in engagement, consultation, scrutiny, co-production, governance, resident panels, focus groups, complaints review, or other activities intended to influence, improve, or help shape BFL's services, policies, or decision-making.

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Introduction

Bromford Flagship LiveWest's Code of Conduct is in line with the National Housing Federation's Code of Conduct. It is a summary of the principles and standards of conduct we expect of our Bromford Flagship LiveWest Board and Committee members, colleagues and involved customers. It is supplemented by and should be read alongside regional and legacy policies and procedures that have not been updated to reflect a Group position and Bromford Flagship LiveWest policies and procedures in place across the Group.

It is vital to the reputation of Bromford Flagship LiveWest and social housing that everyone who works for or represents a housing association is held to the highest standards of conduct.

By following the Code and demonstrating Bromford Flagship LiveWest's values in our everyday work, everyone will help to realise Bromford Flagship LiveWest's vision.

1. Acting in the best interests of Bromford Flagship LiveWest and our customers

Everyone has a responsibility to complete their role in line with the purposes and values of Bromford Flagship LiveWest.

A. Meeting your responsibilities

The principle

You must fulfil your duties and obligations responsibly, acting at all times in line with our values and behaviours, as well as in the best interests of Bromford Flagship LiveWest and the delivery of our strategic objectives.

Expected of all

A1 You must always try to fulfil the requirements of your role to the best of your ability. If any circumstances limit your ability to meet your responsibilities, you must raise this with your manager.

A2 In carrying out your role, you must always seek to support our strategic objectives, reflecting our desired culture.

A3 You must not act in a way that discriminates against, or unjustifiably favours, particular 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 customers and colleagues.

Expected of Board members

A5 You must respect the principle of collective decision-making and corporate responsibility.

A6 You must ensure you declare to Bromford Flagship LiveWest any relevant personal relationships, employment and other appointments you hold, and that these do not interfere with your ability to perform or conflict with your role as a board member.

Expected of colleagues

A7 You must consult your manager before taking any other paid or voluntary work that may interfere with your existing job, or conflict with the terms set out in your contract of employment.

B. Representing Bromford Flagship LiveWest

The principle

In representing Bromford Flagship LiveWest in any capacity, you are an ambassador for the business and must uphold and promote our values, objectives and policies. This includes at external events, dealing with outside bodies and on social media.

Expected of all

B1 In representing Bromford Flagship LiveWest, you must act in line with our values, behaviours, policies and goals.

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

B3 You must not make derogatory, false or otherwise damaging comments, in person or through any medium, about Bromford Flagship LiveWest or any person, service or organisation connected with us.

B4 You must not seek to officially represent the views or position of Bromford Flagship LiveWest without prior authority.

B5 You must adhere to our policies/procedures in the use of email, internal channels (such as our intranet pages) and internet services, including social media.

B6 When representing Bromford Flagship LiveWest through any medium, including social media, you must at all times act with professionalism.

B7 Where any personal social media accounts refer to your role with Bromford Flagship LiveWest, you must make it clear in what capacity you are communicating.

Expected of Board members and colleagues

B8 If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect Bromford Flagship LiveWest, you must declare your involvement and must ensure your activity does not pose a material risk to the association.

2. Behaving with integrity

By integrity, we mean that you must act honestly, transparently and in line with the highest standards of ethical conduct. The reputation of Bromford Flagship LiveWest depends on compliance with this Code, and with the laws, policies and procedures that it refers to.

C. Conflicts of interests

The principle

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

Expected of all

C1 You must formally declare, 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 customers and Bromford Flagship LiveWest. You must make sure that these interests do not interfere with your ability to carry out your role effectively. You must complete a declaration of interest form when required to do so and update any declaration made if your circumstances change.

C2 You must declare any known relationship to a person applying for or performing a role within Bromford Flagship LiveWest and must not be involved in their appointment, performance management or reward nor seek or accept preferential treatment for them.

C3 You must declare any known relationship to a customer or potential customer of the association. You must not be involved in decisions relating to their relationship with Bromford Flagship LiveWest 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 Bromford Flagship LiveWest colleagues are permitted to use Bromford Flagship LiveWest contractors for private goods or work in their own homes. This is provided the work will be undertaken or was undertaken under the contractor's standard commercial terms and that no financial or other advantage was gained by you or the contractor, unless under an approved discount scheme offered by Bromford Flagship LiveWest.

C6 You must not use, or attempt to use, your position to promote personal interests or those of any connected person, business or other organisation for personal gain.

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 members and involved customers

C8 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.

C9 You must act independently and fairly, avoiding involvement in individual operational matters unless this is part of an agreed role.

C10 Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign if the conflict is material or long-standing, and in the opinion of the board cannot be managed appropriately. For involved customers, a conflict could include a matter being discussed that relates specifically to the individual's home. It should not prevent customers taking part in discussions about matters that affect larger groups of customers.

Expected of involved customers

C11 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 Bromford Flagship LiveWest, you must not offer, seek or accept bribes or incentives 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 not seek or accept preferential treatment in the provision of benefits such as housing accommodation or employment.

Expected of all

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

D2 You must not ask for or seek gifts or hospitality or other benefits.

D3 Any gifts or hospitality offered to or by you must be either declared or declined according to our policies and/or procedures.

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 customers

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 not misuse Bromford Flagship LiveWest's funds or resources, or seek preferential treatment for your own personal benefit.

Expected of all

E1 You must ensure Bromford Flagship LiveWest's funds and resources are used properly and efficiently.

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

E3 You must take all reasonable measures to protect Bromford Flagship LiveWest'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 Bromford Flagship LiveWest's policies and procedures.

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 process information in accordance with the law and Bromford Flagship LiveWest's policies and procedures. Information should be treated with openness, transparency and accountability.

Expected of all

F1 You must not disclose, without the required permission and authority, any personal data about customers or colleagues. This duty continues to apply after you have left Bromford Flagship LiveWest 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 Bromford Flagship LiveWest 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(s) any unpublished information or materials relating to Bromford Flagship LiveWest, unless you are doing so in accordance with Bromford Flagship LiveWest's whistleblowing policies and procedures.

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

G. Working with customers

The principle

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

Expected of all

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

G2 You must not allow any personal relationship with a customer 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 customers.

G4 You must handle customers' money only where absolutely necessary and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with our policies and/or procedures.

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

G6 You must maintain appropriate boundaries with colleagues and customers.

Expected of involved customers

G7 When you advocate for issues, concerns or experiences raised by customers 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 Bromford Flagship LiveWest any reasonable suspicions you have about possible wrongdoing in line with Bromford Flagship LiveWest's relevant policies and procedures.

Expected of all

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 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 or disadvantage any person who uses or intends to use our confidential reporting (whistleblowing) procedures to report actual or alleged wrongdoing.

3. Treating others fairly, with respect and empathy

The way in which people behave towards each other is fundamentally important to the experience of Bromford Flagship LiveWest's customers and colleagues. 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 this in a way that is responsible and, where possible, empowers other people.

Expected of all

I1 You must treat everyone you meet in the performance of your role with equal respect, politeness, empathy and consideration.

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

I3 You must promote, through your own behaviours, our organisational culture where people of all backgrounds and cultures feel fairly treated, respected and listened to and 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 your 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 in the workplace and, where it is your role to do so, you must investigate any such reports thoroughly, with compassion and respect confidentiality.

Expected of colleagues

I7 If your role includes working in customers' 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.

Expected of involved customers

I8 You must treat all BFL colleagues with equal respect, politeness, empathy and consideration.

J. Professional relationship

The principle

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

Expected of all

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, maintaining independence and integrity at all times. You must conduct relationships with other people who hold roles at Bromford Flagship LiveWest (whether involved customers, board members or staff) in an appropriately professional way.

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

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

Expected of board members

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

J6 You must set an example by demonstrating the highest standards of honesty and ethics and your alignment with Bromford Flagship LiveWest's values, policies and objectives.

Expected of board members and involved customers

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

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

Expected of colleagues

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

J10 You must not use informal channels to lobby or influence board members or involved customers on matters of business of Bromford Flagship LiveWest.

J11 You must not knowingly mislead the board or any of the housing association's committees or Executive meeting groups. In presenting information, you must set out the facts and relevant issues and risks truthfully.

4. Taking responsibility for the impact of your actions

You have a responsibility while working for Bromford Flagship LiveWest to consider the immediate and longer-term impact of your actions and to be accountable for them.

K. Customer experience

The principle

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

Expected of colleagues

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

K2 You must be prepared and able to offer customers 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, by whoever this is provided.

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

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 Bromford Flagship LiveWest, you must report this immediately through the appropriate channels.

L3 Where your role influences customer safety, property safety or compliance, you must give these matters appropriate priority and must not knowingly delay or overlook safety concerns.

M. Environment and sustainability

The principle

Within your role, you must consider and strive to avoid or reduce possible negative environmental and sustainability impacts.

Expected of all

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 should consider the long term environmental impact of your decisions and take reasonable steps to reduce unnecessary waste and resources used.

N. Digital and data

The principle

You must ensure that your use of digital systems, data and emerging technologies is responsible and in line with our policies and procedures. This helps us to protect customers, colleagues and the organisation from harm.

Expected of all

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 the Bromford Flagship LiveWest. 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 the Bromford Flagship LiveWest'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.

O. Learning and development

The principle

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

Expected of all

O1 You must play an active part in Bromford Flagship LiveWest's supervision and performance appraisal processes as it applies to you.

O2 You must offer open and constructive feedback to others and invite feedback about your own performance.

O3 You must make your personal training and development needs relevant to your role known to Bromford Flagship LiveWest and undertake all mandatory training required for your role.

O4 Unless there are exceptional reasons, you must attend learning and development events as required and apply learning to your role.

O5 You must recognise the limits of your knowledge, skills and experience. Where a matter falls outside your competence, you must seek advice, supervision, support or training before acting independently.

Expected of Board members

O6 You must keep your knowledge up to date in those areas in which you are a specialist, as well as any matters relating to Bromford Flagship LiveWest and the wider housing sector.

Expected of colleagues

O7 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.

08 Where a role is subject to professional qualification requirements or regulatory competency requirements, you must maintain compliance with those requirements and cooperate with any organisational arrangements for evidencing competence.

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

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 customers, services, safety or the reputation of Bromford Flagship LiveWest.

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 the housing association to continue to improve outcomes.

Expected of all

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

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

Q3 You must contribute to a culture in which concerns, mistakes and learning can be discussed openly without fear of blame or retaliation.

Embedding and monitoring

The Code of Conduct is embedded within BFLs induction process and culture roadmap, with compliance against the Code monitored through performance management review processes.

Version Control

Note: minor updates approved by delegated authority increase version number by 0.1; major updates and formally approved versions increase version number by 1.0.

Version	Detail	Approved by	Date
1.0	First issue	Audit and Risk Committee	February 2026
2.0	Revised to reflect changes made within the 2026 NHF Code and in readiness for the implementation of the Competency and Conduct Standards ahead of the Oct 2026 requirement.	BFL Board	September 2026

Appendix 1: Supporting Policies

Reference should be made to all relevant BFL policies and procedures, including but not limited to those listed below.

- Allocations and lettings policies and procedures
- Code of conduct for contractors / Working in our customers' homes guidance
- Confidential reporting (Whistleblowing) policy
- Data protection policy and related procedures and guidelines
- Equality, diversity & inclusion policy
- Financial Crime Prevention Policy
- Health & safety policy and procedures
- Information technology, security and data policies and procedures
- Uk Corporate Code of Governance 2024
- Non-executive board and committee members' expenses policy
- People policies and procedures, including the BFL Values and Behaviour Framework and colleague behaviours standard operating procedures
- Social media Policy
- Group and Arrangements for Managing Conflicts of Interest
- Procurement policy and procurement procedures
- Your employment contract (for colleagues)
- Your agreement for services (for non-executive Board and Committee Members)