



Places to live. Space to grow.

Code of Conduct

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1 Introduction: the purpose of this policy

- 1.1 West Kent is committed to delivering safe, high-quality, respectful and effective services to residents, employees and communities. The way we behave, make decisions and carry out our roles has a direct impact on resident safety, trust and outcomes as well as providing a respectful and professional service to each other.
- 1.2 This Code of Conduct sets out the standards of behaviour expected from everyone working for or on behalf of West Kent. It supports delivery of the Regulator of Social Housing's Competence and Conduct Standard effective from 01 October 2026 and reflects our organisational values.
- 1.3 The Code applies to:
- Employees (permanent and temporary)
 - Board members and committee members
 - Contractors, partners and service providers including agency workers
 - Involved residents acting on behalf of West Kent
 - It applies to all professional interactions, including but not limited to:
 - Day-to-day work activities
 - Resident interactions
 - External meetings and events
 - Digital communications and social media
- 1.4 You must familiarise yourself with the Code of Conduct and act in accordance with it at all times. Failure to meet the standards set out in this Code may result in formal action in line with relevant policies.

2 Policy Statement

- 2.1 West Kent has adopted the NHF Code of Conduct 2026 and is committed to maintaining the highest standards of professionalism, competence, and conduct in the services we provide. This policy sets out how we expect everyone working for or on behalf of West Kent to behave in line with our values. This ensures that we put residents first and behave in a way that builds trust and confidence in our services.

3 Conduct expectations

- 3.1 This Code sets out clear expectations to ensure:
- Employees and residents are treated with dignity, integrity, respect and fairness
 - Decisions are made ethically and in the best interests of residents
 - Individuals act within their competence and authority

- We meet regulatory, legal and ethical requirements

3.2 All employees and representatives of West Kent are expected to:

- Act in line with West Kent's values, policies and Customer Service Standards
- Behave with honesty, integrity and professionalism
- Take personal and professional responsibility for actions, decisions and outcomes, including seeing issues through to a resolution
- Act in the best interests of residents and the organisation.
- Maintain clear and appropriate professional boundaries
- Treat everyone with dignity, respect and fairness
- Use clear, accurate, inclusive and timely communication ensuring residents are kept informed without needing to chase
- Work within the limits of their role, authority and competence
- Challenge inappropriate, unethical or unsafe behaviour
- Provide consistent and accurate information, ensuring alignment across teams and services
- Deliver on commitments made to residents and colleagues, or proactively explain and manage any delays
- Demonstrate accountability by acknowledging mistakes, taking corrective action and learning from outcomes

4 Working with residents and service users introduction:

4.1 We recognise the responsibility that comes with working with residents, including those who may be vulnerable or experiencing distress.

4.2 We must:

- Deliver services professionally, fairly, consistently and courteously, in line with agreed service standards
- Work collaboratively across teams and services to ensure a joined-up and seamless resident experience
- Actively listen to residents, acknowledge their concerns and ensure they feel heard, understood and taken seriously

- Take ownership of resident issues from the first contact through resolution or ensure clear handover with named responsibility
- Not allow personal relationships to influence professional decisions
- Maintain appropriate professional boundaries at all times
- Safeguard residents and respond appropriately to concerns
- Handle resident information and finances responsibly
- Communicate clearly and respond within agreed timescales
- Provide clear accurate and easy-to-understand information keeping well maintained records
- Keep residents regularly informed of progress, using agreed communication methods and timeframes
- Respond to queries and request promptly in line with the service standards
- Proactively provide updates without the need for residents to follow up
- Clearly explain decisions, particularly where expectations cannot be met.

5 The main principles of the Code:

- 5.1 We recognise the responsibility that comes with working with residents, including those who may be vulnerable or experiencing distress.
- 5.2 **General responsibilities:** you must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of West Kent, its residents and other service users and in accordance with our values.
- 5.3 **Conflicts of interest:** you must take all reasonable steps to ensure that no undeclared conflict arises, or could reasonably be perceived to arise, between your duties and your personal interests, financial or otherwise. You are required to declare any private interests which may, or may be perceived to, conflict with the duties of your role or the interests of the organisation. You must not use, or attempt to use, your position to promote your personal interests or those of any connected person, business or other organisation.

Examples of potential conflicts of interest include but are not restricted to:

- Being involved in the selection, appointment, management, allocation of work to, or approval of payments for a contractor, consultant or supplier where you, a family member, close friend or associate has a personal, financial or business connection with that individual or organisation.
- Influencing, or attempting to influence, decisions relating to the allocation of housing, transfers, repairs, complaints, support services or any other service provision involving a resident who is a family member, friend, neighbour, partner or

someone with whom you have a close personal relationship.

In any such circumstances, you must declare the conflict immediately and remove yourself from any decision-making, recommendation or approval process relating to the matter.

5.4 **Bribery, gifts and hospitality:**

You must comply with the following policies:

- Anti-Bribery Policy
- Anti Facilitation of Tax Evasion policy
- Fraud Policy
- Whistleblowing Policy
- Gifts, Hospitality and Declarations Policy

5.5 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 organisation that might reasonably be seen to compromise your judgement or integrity or place you under any obligation to those individuals or organisations.

5.6 **Funds and resources:** you must not misuse West Kent's funds or resources or seek preferential treatment for your own personal benefit.

5.7 **Confidentiality:** you must handle information in accordance with the law, your contractual requirements, and West Kent's policies and procedures.

5.8 **Respect for others:** you must treat others with respect at all times. This includes online and through social media.

5.9 **Relationship between board members, employees, partnering contractors, and involved residents:** board members, employees, partnering contractors, and involved residents must maintain a constructive, professional relationship based on a sound understanding of their respective roles.

5.10 **Relationship with residents and other service users:** you must maintain high standards of professionalism, fairness and courtesy in all your dealings with residents and other service users.

5.11 **Health safety and security:** your conduct must not endanger the health, safety or security of yourself or others and you must comply with the law as well as with the organisations policies and procedures. For further information, please refer to our Staying Safe at Work Procedure, which is available on the intranet. All employees have a responsibility to report all accidents and incidents. This includes reporting any 'near miss' incidents. Information on how to report accidents, incidents, and near misses is available on the intranet.

5.12 **Conduct at meetings:** your conduct at meetings must meet a high standard of integrity, commitment and courtesy.

- 5.13 **Representing West Kent:** in representing West Kent at external events and in dealings with outside bodies, you must uphold and promote West Kent's values, objectives and policies.
- 5.14 **Learning and development:** in partnership with West Kent, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge, reflecting on resident feedback and complaints to improve individual and team performance.
- 5.15 **Reporting concerns:** you must report any reasonable and honest suspicions you may have about possible wrongdoing. If you believe that you are expected to act in a way which conflicts with this code, you must report this to your line manager or a member of the Human Resources team. More information is available in the Whistleblowing Policy.

6 Provisions

- 6.1 Conduct that could be detrimental to the reputation of West Kent will be dealt with:
- for employees: as outlined in the Disciplinary Policy and Procedure, a copy of which is available on the intranet.
 - for involved residents: through the resident involvement team and in line with the applicable terms of reference for the relevant resident group.
 - for board members: by the Chair, in consultation with the Chief Executive, unless it relates to the Chair in which case the SID takes the relevant roles.
 - for partnering contractors: as outlined in contract documentation. You must comply with the law, your duties, your terms of appointment and West Kent's policies and procedures.
- 6.2 You must take responsibility for understanding West Kent's values and use them to guide you in fulfilling your duties and responsibilities. Living these values will give your customers a richer experience and you a greater sense of satisfaction.
- 6.3 You must take responsibility for understanding West Kent's strategic objectives and consider how they should be fulfilled when carrying out your duties and responsibilities.
- 6.4 You must not conduct yourself in a manner which could reasonably be regarded as bringing West Kent into disrepute. This includes but is not limited to:
- at events, including social events, which you attend as a West Kent representative, even if the event is outside normal working hours. At events with alcohol, you are expected to drink responsibly and behave in a way that does not damage the reputation of West Kent or cause risk or offence to others.
 - membership of, or participation in, activities organised by groups or organisations whose values are inconsistent with West Kent's (for instance, racist or extremist organisations) which could create reasonable doubt in your ability to comply with West Kent's values and this Code.
- 6.5 Personal use of social media during working hours is encouraged if it is promoting West Kent. Occasional personal use of social media during working hours is permitted so long as it does not involve unprofessional or inappropriate content, does not interfere with your

employment responsibilities or productivity and complies with the Social Media Guidelines available on the intranet.

- 6.6 You must not bring West Kent's name or its partners into disrepute or affect its integrity by your actions or words, either within the Organisation or outside. This includes the use of, or entries on, social networking sites (such as Facebook, Tik Tok, YouTube and others).
- 6.7 You must not act in a way that unjustifiably favours or discriminates against particular individuals, groups or interests. You must act in accordance with West Kent's Equality and Diversity Policy on the intranet.
- 6.8 You must respect the appropriate channels for handling tenancy and service provision issues. You must not act outside West Kent's established procedures in any matter concerning any resident or other service user. You must raise concerns where resident experience, communication, or service delivery falls below expected standards; or where the exception applies to statutory duties, safeguarding or whistleblowing obligations.
- 6.9 You must not misuse your position, for example, by using information acquired during your duties for your private interests or those of others.
- 6.10 You should respect the principle of collective decision-making and corporate responsibility. Once a decision has been reached through the appropriate governance process, individuals are expected to support its implementation and contribute positively to achieving the agreed outcome. This does not prevent you from raising questions, concerns or alternative views through the appropriate channels before a decision is made, or from using relevant organisational policies and procedures where genuine concerns need to be raised.
- 6.11 You must not engage in political or campaigning activity that might reasonably be regarded as compromising the position of West Kent. Board members or involved residents intending to stand for political office must discuss the matter with the Chair; members of staff must discuss this with their line manager. West Kent will not grant or withhold permission to stand for political office. For involved residents and Board members, we will consider whether the individual may continue in the relevant West Kent representative role.
- 6.12 **Board members:** If you take up new employment or appointments during your term of office on the Board, you must make any necessary declaration of interest. Any such work or position must not interfere with your role as a board member.
- 6.13 **Employees¹** You must consult your manager before taking on any outside work or any position, paid or unpaid. Any such work or position must not interfere with your existing job or conflict with the interests of your job or West Kent.

¹ See also your contract of employment

7 Competence and Professional Standards

- 7.1 All individuals must ensure they are competent to carry out their role safely and effectively. West Kent's Professionalism policy provides further details and guidance on professional standards, competence and capability requirements.
- 7.2 Employees must only undertake work that they are competent to perform and must raise concerns where they feel out of their depth or unsupported. Ongoing learning is essential to maintaining professional standards.

8 Reporting concerns and Whistleblowing

- 8.1 West Kent promotes a culture where concerns can be raised openly and addressed fairly via the policies and procedures in place.
- 8.2 You must:
- Report concerns about conduct, competence or safety as soon as possible
 - Use appropriate reporting routes, including line management or the use of the whistleblowing policy
 - Support others to raise concerns in good faith.
- 8.3 Employees shall be protected from intimidation, victimisation or discrimination for bringing a complaint or assisting in an investigation. Retaliating against an employee for making a complaint is itself a disciplinary offense.

9 Responsibilities

9.1 Executive Team, Leadership Team and Board Members

Responsible for

- Setting the tone and culture of professionalism, integrity and conduct.
- Ensuring compliance with regulatory and governance requirements.
- Providing appropriate oversight, scrutiny and assurance across the organisation.
- Demonstrating and promoting the behaviours and standards expected under this Code of Conduct.
- Ensuring concerns relating to conduct are addressed appropriately and consistently with accurate records maintained.

9.2 Managers:

Managers must:

- Role model professional behaviour
- Clearly communicate expectations
- Provide supervision and support
- Address concerns promptly and fairly
- Monitor conduct, competence and learning

9.3 **All Employees:**

Employees must:

- Always act professionally and ethically
- Work within their competence
- Complete required learning and development
- Raise concerns where standards may be compromised

9.4 **Service Provider conduct and competence**

West Kent expects service providers, contractors and partners to meet the same standards as employees.

They must:

- Act professionally, ethically and lawfully
- Treat residents with dignity and respect
- Maintain appropriate competence and training
- Comply with contractual and policy requirements
- Adhere to the same behavioural standards as West Kent employees when interacting with residents
- Attend appointments at agreed times and provide appropriate notice of delays or changes
- Respect residents' homes by working safely, cleanly and considerately
- Be aware of and adapt to residents' individual needs, including vulnerability and accessibility requirements
- Ensure consent is obtained before recording, entering or undertaking work within a resident's home

Performance will be monitored through contract management, audits and feedback. Staff involved in procuring contractors to deliver on West Kent's behalf must consider whether to include this Code within the contracting arrangements, or ensure its purpose is achieved by alternative means.

10 Regulation

This policy supports compliance with:

- Social Housing (Regulation) Act 2023
- Competence and Conduct Standard (2025)
- Equality Act 2010
- Consumer Standards
- Other relevant policies, legislation and regulatory requirements.

11 Reporting

11.1 West Kent will monitor compliance through:

- Performance and supervision processes
- Learning and training compliance
- Complaints, feedback and investigations
- Internal audits and governance reporting.

11.2 Regular reporting will be provided to the Executive Team and relevant Committees to ensure ongoing compliance and continuous improvement

12 Resident Engagement and Consultation

12.1 We have engaged with residents in the development of this policy via a resident wide survey in March and early April 2026 and a more in-depth focus group in April 2026. Once drafted, it was then reviewed by our Scrutiny Panel.

12.2 The policy has also been reviewed by a range of stakeholders, including:

- Executive Team
- Governance team
- Heads of Service
- People and Organisational Development team
- Employment Law specialists
- Scrutiny Panel

13 Communication

13.1 This policy is available on our internal intranet and is viewable and accessible by all employees, who are our primary audience for this policy.

13.2 It's also available on the West Kent external website, where it'll remain accessible to our residents and the wider general public, including our stakeholders.

14 Related policies and support documents:

- National Housing Federation (NHF) Code of Conduct (2026)
- Disciplinary Policy
- Bullying and Harassment Policy
- Whistleblowing Policy
- Probation Policy
- Grievance Policy
- Recruitment Policy
- Professionalism Policy
- Anti-Bribery Policy
- Anti-Facilitation of Tax Evasion Policy
- Fraud Policy
- Gifts, hospitality and declarations policy
- Staying Safe at Work Procedure
- Social Media Guidelines
- Equality and Diversity Framework
- Contractor code of conduct

Appendix – Dress code

Each employee is an ambassador for West Kent in the way they dress and the way they behave in accordance with our values.

Employees are expected to present a professional and positive image to colleagues, customers, clients and external stakeholders when working for West Kent and therefore the principle is smart casual dress or the uniform provided.

Employees should dress appropriately for the location they'll be working in and for the people they're meeting. Normally, this will be smart casual for working in the office or the community. There may be occasions where it is more appropriate to wear smart business attire, for formal occasions such as interviewing or attending scheme openings. Equally, there are circumstances where it may be appropriate to wear casual clothes such as jeans because of specific work circumstances.

- Employees required to wear a West Kent uniform must do so. Uniforms should also be clean and in good repair.
- Where safety clothing or equipment is provided, it must be worn and/or used for the purpose intended. If you are visiting a site or working to maintain a property, you should ensure that you wear the appropriate safety clothing.
- Clothes and accessories should be clean and in good repair.
- Clothes and accessories (including face masks) should not cause offense, draw undue attention to the staff member or create a distraction.
- Managers are responsible for ensuring that their teams and their service is presenting a professional image. They will raise any concerns confidentially with individual employees. Employees are expected to respond constructively to any requests to change the way they are presenting themselves.
- We are an inclusive organisation and employees are permitted to wear clothing, jewellery and accessories that are central to their religious faith or culture. West Kent recognises and respects the right of employees to wear clothing, headgear, or accessories that reflect their religious beliefs or cultural heritage or are relevant to specific health requirements.

Such attire is permitted provided it:

- Does not pose a health or safety risk to the wearer, colleagues, or others.
- Does not prevent the employee from performing their duties effectively.
- Meets reasonable standards of cleanliness and professional appearance.

Where specific safety equipment or uniform requirements apply, employees will be supported in finding suitable adaptations that accommodate their religious or cultural dress or health requirements.

- Employees working in West Kent's offices on Friday can dress down and wear jeans and trainers if they are not meeting external visitors.
- There is no requirement to wear suits unless the occasion is very formal.

- Sportswear or beachwear is not permitted