

# Code of Conduct: One-Page Summary

**Purpose and scope.** This Code sets the behaviour expected of Trustees, Staff, Volunteers and Involved Residents when working or making decisions for ExtraCare.

## The five core expectations

1. **Act in the best interests of residents and ExtraCare:** fulfil your role, support strategic objectives, represent the charity professionally, value residents' views and avoid conduct that could damage trust or reputation.
2. **Behave with integrity:** act honestly and transparently; declare and manage conflicts; reject bribery or improper benefits; use funds and resources properly; protect confidential information; maintain appropriate boundaries; and report concerns promptly.
3. **Treat others fairly, with respect and empathy:** be inclusive, considerate and consistent; respect individual identities and experiences; do not bully, harass, intimidate or discriminate; maintain constructive professional relationships and welcome respectful challenge.
4. **Take responsibility for the impact of your actions:** consider resident experience, explain decisions, respond to feedback, protect health, safety and wellbeing, reduce environmental harm, and use data, digital systems and permitted artificial intelligence responsibly.
5. **Act with diligence and care:** understand your responsibilities, prepare properly, complete required learning, work within your competence, escalate risks, maintain accurate records where required, and learn openly from mistakes, complaints and feedback.

## What this means in practice

- Put residents' safety, wellbeing, dignity and long-term interests at the centre of decisions.
- Declare relevant interests and relationships early; step back from decisions where impartiality could be questioned.
- Do not seek personal advantage, misuse ExtraCare resources, accept improper gifts, or influence decisions unfairly.
- Protect personal, confidential and commercially sensitive information.
- Keep relationships and communications professional, including online; use authorised channels and systems.
- Recognise problems, safeguarding concerns, wrongdoing, data or cyber risks, and health and safety issues—record facts where appropriate and report them immediately.
- Never disadvantage or victimise anyone who raises a concern in good faith.

**Accountability.** Everyone is responsible for understanding the requirements that apply to their role and following ExtraCare's policies, procedures, legal duties and professional standards.

**If in doubt:** pause, protect residents and others from harm, seek advice from the appropriate manager or governance lead, and report the issue through the relevant ExtraCare channel.

# Code of Conduct

This Code describes the standards of behaviour expected from people who carry out work or decision-making on behalf of ExtraCare. These standards protect residents, staff, volunteers and ExtraCare's reputation, and ensure that services are delivered appropriately, consistently and empathetically in line with ExtraCare's mission, vision and values.

This Code of Conduct is structured around five key areas and applies to Trustees (T), Staff (S), Volunteers (V) and Involved Residents (IR). Involved Residents are those residents who have a formal role in the Charity's governance, scrutiny or decision-making arrangements

## **The five core expectations are:**

1. Acting in the best interests of residents and ExtraCare (pages 2-3)
2. Behaving with integrity (pages 4-8)
3. Treating others fairly, with respect and empathy (pages 9–10)
4. Taking responsibility for the impact of your actions (pages 11–12)
5. Acting with diligence and care (pages 13–14)

## 1. Acting in the best interests of residents and ExtraCare

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 ExtraCare

### A. Meeting your responsibilities

#### The principle

You must act in good faith, putting aside personal gain and making decisions that support the long-term interests of residents as a whole and are in the best interests of ExtraCare

#### Expected of all **T S IR V**

- **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 ExtraCare's strategic objectives, reflecting the charity's desired culture.
- **A3** You must not act in a way that discriminates against, or unfairly 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 residents.

#### Expected of Trustees and Involved Residents **T 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 **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 ExtraCare's purpose, or conflict with the terms set out in your contract of employment.

### B. Representing ExtraCare

#### The principle

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

#### Expected of all **T S IR V**

- **B1** In representing the charity, 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 the charity into disrepute through dishonest, misleading or inappropriate behaviour.
- **B3** You must not make knowingly false, malicious or misleading statements about the charity or those connected with it.
- **B4** You must not seek to officially represent the views or position of the charity unless authorised to do so.
- **B5** When representing the charity 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 the charity, you must make it clear in what capacity you are communicating.
- **B7** You must not discuss residents or colleagues on social media.

#### **Expected of Trustees and Staff T S**

- **B8** If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect the charity, you must obtain appropriate prior consent from the charity. Such consent must not be unreasonably withheld unless your activity poses a material risk to the charity.
- **B9** You must not connect with residents or their relatives on social media. (excluding those Trustees who are also residents).

## 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 and good name of ExtraCare depends on compliance with this code, and with the laws, policies and procedures that 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 the charity and your personal interests, other duties and relationships.

#### Expected of all T S I R V

- **C1** You must formally declare to the charity, 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 the charity; 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 charity where this could reasonably be perceived to influence your role. You must not be involved in decisions relating to their relationship with the charity or seek or accept preferential treatment for them.
- **C3** You must declare any known relationship to a member of staff or trustee where this could reasonably be perceived to influence your role. You must not be involved in decisions relating to their relationship with the charity 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 charity and must not be involved in their appointment, performance management or reward.
- **C5** Except where specifically permitted, as set out in the ExtraCare'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 Trustees, Staff and Volunteers T S V

- **C8** You must declare any known relationship to a person applying for or performing a role within the charity and must not be involved in their appointment, performance management or reward.
- **C9** You must not be involved in any recruitment or selection process where you have a close connection with a person applying for the role.

### Expected of Trustees and Involved Residents **T IR**

- **C10** 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.
- **C11** You must act independently and fairly, avoiding involvement in individual operational matters unless this is part of an agreed role.
- **C12** 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.

## D. Bribery, gifts and hospitality

### The principle

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

### Expected of all **T S IR V**

- **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 the Gift and Hospitality Policy. Accepted gifts must be recorded in the Gifts and Hospitality register.
- **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 report as detailed in the Anti- Bribery policy.

### 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 the charity's funds, resources and assets responsibly, transparently and only for proper purposes.

### Expected of all **T S I R V**

- **E1** You must ensure that the charity's funds and resources are used properly and efficiently.
- **E2** Your procurement decisions must be guided by the charity's policies and fairness in decision-making and in line with relevant law.
- **E3** You must take all reasonable measures to protect the charity'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 the charity's policies and procedures.

### Expected of Trustees **T**

- **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 that is provided to you in your role responsibly and lawfully, balancing confidentiality, commercial sensitivity and legal obligations with openness, transparency and accountability.

### Expected of all **T S I R V**

- **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 the charity 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 the charity 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 charity, unless you are doing so in accordance with the charity'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.
- **F5** Images and recordings may only be created, stored or shared for an authorised purpose with appropriate consent and in line with data protection requirements. You must not use personal devices to photograph or record residents or their information.
- **F6** You must not share inappropriate personal information.

- **F7** You must not discuss confidential workplace matters, disciplinary issues or information about other residents.

## **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 Trustees, Staff and Volunteers T S V**

- **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 request or receive any non-monetary item, personal loans or gifts of money (including will bequests) from residents.
- **G4** You must handle residents' money only where absolutely necessary as part of your role and ensure that a receipt is completed for every transaction. In any event, you must operate in accordance with the charity's 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.
- **G6** You must maintain appropriate boundaries with staff and residents and must not allow personal relationships to influence how you carry out your role.
- **G7** You must not develop personal relationships with residents or relatives. Staff must not enter into an intimate or sexual relationship with a resident or encourage a relationship that could become intimate. Such conduct is a serious breach of trust and may be a safeguarding matter.
- **G8** Staff must not become over involved or create dependency. Any sign that a resident or member of staff is becoming emotionally attached or dependent must be handled sensitively, documented factually and reported promptly so that appropriate safeguards can be agreed.
- **G9** Travel arrangements for residents must be authorised, safe, risk assessed and consistent with ExtraCare policy. Staff must not transport residents in personal vehicles without authorisation which would only be for genuine emergency and with appropriate insurance.
- **G10** You must not consume alcohol or be under the influence of drugs whilst on duty on ExtraCare premises.

### Expected of Involved Residents **IR**

- **G11** 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 ExtraCare's relevant policies and procedures.

### Expected of all **T S IR V**

- **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. You should refer to ExtraCare's policies including Fraud, Anti-Bribery, Safeguarding, Whistleblowing etc for information on how to report concerns.
- **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.

### 3. Treating others fairly, with respect and empathy

The way in which people behave towards each other is fundamentally important to the experience of residents and staff of the charity. 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, consistency, 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 **T S I R V**

- **I1** You must treat everyone you engage with through your role with respect, politeness, consideration and empathy in a consistent, appropriate and approachable manner.
- **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 contributes 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 the workplace or use language in the performance of your role which other people might reasonably find inappropriate, abusive or offensive.
- **I6** You must report through appropriate channels any instances of unfair or unequal treatment associated with the charity 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

Trustees, staff and involved residents must maintain constructive, professional relationships with each other, based on a sound understanding of their respective roles. Professional boundaries protect residents, relatives, colleagues and ExtraCare. They ensure that relationships remain respectful, appropriate and focussed on the residents' needs. If a boundary becomes unclear, is crossed or may create a safeguarding or conflict of interest risk, staff must step back, record relevant facts and seek advice from their manager.

### Expected of all **T S IR V**

- **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 the charity (whether involved residents, trustees 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 Trustees **T**

- **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 the charity.

### Expected of Trustees and Involved Residents **T 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 **S**

- **J9** You must avoid, in a professional setting, inappropriate personal familiarity with trustees and involved residents.
- **J10** You must not use informal channels to lobby or influence trustees or involved residents on matters of the charity's business.
- **J11** You must not knowingly mislead the board or any of the charity's committees. 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 on the charity's business to consider the immediate and longer-term impact of your actions and to be 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 Trustees Staff and Volunteers and T S V

- **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, 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 T S IR V

- **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 charity, you must report this immediately through the appropriate channels.

### M. Environment and sustainability

#### The principle

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

#### Expected of all T S IR V

- **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 the charity itself from harm.

### Expected of all T S IR V

- **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 charity. 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 charity's values and responsibilities.
- **N4** You may only use artificial intelligence when ExtraCare allow it. You must use it openly and carefully, and people must remain responsible for any decisions made.

## 5. Acting with diligence and care

The diligence and care with which roles are performed has a significant impact upon 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 the charity, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

#### Expected of all T S IR V

- **O1** You must play an active part in the charity'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 Trustees T

- **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.
- **O5** You must be committed, accountable and active at Board and Committee meetings, preparing properly and contributing constructively to discussion, scrutiny and decision-making.
- **O6** You should visit ExtraCare locations and attend appropriate events that provide opportunities to meet and listen to residents and staff.
- **O7** If you are unable to fulfil the expectations of the Trustee role and this Code, you must raise this promptly and be prepared to step down from the role.

#### Expected of staff S

- **O8** 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 T S IR V

- **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.
- **P5** Colleagues who provide care or support must deliver safe, high-quality and person-centred services; act in each resident's best interests; obtain and document valid consent; promote choice, independence and self-care; recognise, record and report changes in need; respond appropriately to complaints and care concerns; maintain complete, accurate and timely care records; follow safeguarding and information-governance requirements; work only within their assessed competence and role; and comply with any professional code or registration requirements that apply to them.

## 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 charity to continue to improve outcomes.

### Expected of all T S IR V

- **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.

### Trustee- specific governance and scope

- For the purposes of this Code, references to Trustees include interim Trustees, co-optees of the Board or its Committees, and Directors appointed to the boards of ExtraCare subsidiary companies.
- Trustees commit to the Nolan Seven Principles of Public Life: selflessness, integrity, objectivity, accountability, openness, honesty and leadership. Trustees also adopt the NCVO Charity Ethical Principles of beneficiaries first, integrity,

openness and the right to be safe. Individually and collectively, Trustees must set an example in the conduct of ExtraCare's business, promote the highest standards of corporate conduct and act to promote ExtraCare's success and maximise public benefit. The Board must lead in ensuring that ExtraCare's constitution, Standing Orders and scheme of delegation conform to best practice and support high standards of conduct.

- Any alleged breach of this Code by a Trustee will be referred to the Senior Independent Director. The Trustee will be given a fair opportunity to be heard. A substantial breach may result in removal from the Board in accordance with ExtraCare's governing documents and applicable procedures.
- Trustees should raise questions or concerns about the application of this Code with the Company Secretary.