Standards of Behaviour Policy

Uncontrolled if printed – This may not be the latest version of the policy.

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1. Policy Scope

Bernicia Group expects all colleagues, board members, involved tenants, contractors and service providers acting on its behalf to conduct themselves in a professional manner that reflects the organisation's values and maintains confidence in the services we provide.

This policy applies to all colleagues, board members, involved tenants and volunteers across the Bernicia Group. Those who procure or manage contractors and service providers must ensure that they understand and adhere to equivalent standards of conduct and professionalism.

The policy is based on the National Housing Federation Code of Conduct 2026 and supports compliance with the Regulator of Social Housing's Competence and Conduct Standard.

Bernicia will ensure that individuals within the scope of this policy are aware of the standards expected of them and have access to appropriate training, guidance and support. Managers and leaders are expected to role model these standards and address concerns promptly where they arise.

Where possible, minor breaches will be addressed informally; however, formal action may be taken where circumstances require it.

Applying this Policy

This policy cannot anticipate every situation that may arise. Individuals are expected to exercise sound judgement and consider whether their actions align with Bernicia's values, responsibilities and commitment to residents. Where further guidance is required, reference should be made to the associated policies and procedures listed within this document.

2. Purpose and Aim

The purpose of this policy is to set out the standards of behaviour, professionalism and conduct expected of everyone who acts on behalf of Bernicia Group. It provides a framework for ensuring that decisions, actions and interactions with residents, colleagues and stakeholders are undertaken with integrity, respect, accountability and professionalism.

The policy applies to all individuals involved in delivering Bernicia Group's activities and should be read alongside the associated policies and procedures that support its principles. It is based on the National Housing Federation Code of Conduct 2026, as adopted by the Boards.

All individuals are responsible for understanding and complying with the requirements of this policy. Failure to do so may result in action being taken through the relevant employment, governance or other appropriate procedures.

Anyone who is unsure about the application of this policy should seek advice from their line manager. Board members and involved tenants should seek guidance from the Head of Governance.

3. Structure of the Standard of Behaviour Policy

There are five parts to the Standards of Behaviour policy:

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

- **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 the housing association depends on compliance with this code, and with the laws, policies and procedures that it refers to.

- **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 housing association. Respectful, fair and empathetic behaviour is essential to building trust, maintaining effective relationships and supporting a healthy organisational culture.

- **Taking responsibility for the impact of your actions**
  You have a responsibility while on the housing association's business to consider the immediate and longer-term impact of your actions and to be accountable for them.

- **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 on the experience of residents and staff. This includes taking responsibility for your own performance and for meeting relevant professional standards.

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), there are subheadings within the relevant section to distinguish them.

4. Acting In Best Interests of Residents and the Housing Association

4.1 Meeting Your Responsibilities

The principle
You must fulfil your duties and obligations responsibly, acting always in good faith and in the best interests of Bernicia Group, and for the delivery of strategic objectives

Expected of all
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.

In carrying out your role, you must always seek to further Bernicia Group's strategic objectives, reflecting the desired culture.

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.

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

Expected of board members
You must respect the principle of collective decision-making and corporate responsibility.

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

4.2 Representing Bernicia

The principle
In representing Bernicia Group in any capacity, including at external events, in dealings with outside bodies and on social media, you are an ambassador for the organisation and must uphold and promote the organisations values, objectives and policies.

Expected of all
In representing Bernicia Group, you must act in accordance with the organisations values, policies, and goals.

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

You must not make derogatory, false, or otherwise damaging comments, in person or through any medium, about the organisation or any person, service or organisation connected with it.

You must not seek to officially represent the views of position of the organisation without prior authority.

You must adhere to Bernicia Group's policies in the use of email, intranet and internet services including social media.

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

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

If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect Bernicia Group, you must obtain prior consent. Such consent must not be unreasonably withheld unless your activity poses a material risk to the organisation.

Expected of board members
If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect the housing association, you must obtain appropriate prior consent from the housing association. Such consent must not be unreasonably withheld unless your activity poses a material risk to the association

5. 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 Bernicia depends on compliance with this code, and with the laws, policies and procedures that it refers to.

5.1 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 Bernicia Group and your personal interests, other duties and relationships.

Expected of all
You must formally declare to Bernicia 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 Bernicia; you must make

sure that these interests do not interfere with your ability to carry out your role effectively.

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 the housing association or seek or accept preferential treatment for them.

You must declare any known relationship to a resident, potential resident, or other customer of Bernicia Group. You must not be involved in decisions relating to their relationship with the Group or seek or accept preferential treatment for them.

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.

Except where specifically permitted, in line with any related policy, you must avoid using Bernicia Group's contractors and suppliers for private purposes.

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.

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
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.

Expected of board members and involved residents
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.

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

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

5.2 Bribery, Gifts and Hospitality

The principle
In your role with Bernicia Group, 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 organisations that might reasonably be seen to compromise your judgement or integrity or place you under an obligation to those individuals or organisation.

See the Gifts and Hospitality Policy Compliance Note for further information.

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

You must not solicit or seek gifts or hospitality or other benefits.

Any gifts or hospitality offered to or by you must be either declared or declined in line with Bernicia's Gifts and Hospitality Policy Compliance Note.

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 governance team in line with the Gifts and Hospitality Policy Compliance Note.

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

5.3 Funds, Resources and Personal Benefit

The principle
You must use the Bernicia's funds, resources and assets (including data) responsibly, transparently and only for proper purposes

Expected of all
You must ensure that Bernicia Group's funds and resources are used properly and efficiently.

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

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

If you claim reimbursement for any expenses, you must do so in line with Bernicia Group policy and procedures.

You must ensure responsible use and protection of Bernicia Group's data and information as a corporate asset.

See Anti-Fraud, Bribery and Corruption Policy for more information.

Expected of Board Members
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.

5.4 Confidentiality

The principle
You must handle information that is provided to you in your role responsibly and lawfully, in line with Bernicia Group policies, balancing confidentiality, commercial sensitivity and legal obligations with openness, transparency and accountability.

Expected of all
You must not disclose, without the required permission and authority, any personal data about tenants, customers, or colleagues. This duty continues to apply after you have left the housing association or stepped down from your position.

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

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 Bernicia Group, unless you are doing so in accordance with Bernicia Group's Speak Up - whistleblowing policy and procedure.

You must not prevent another person from gaining access to information to which they are entitled to by law.

Expected of board members
Whilst all board discussions and papers are sensitive, and should not be freely discussed, those items of enhanced confidentiality will be highlighted with pink headers and marked confidential in agendas and minutes. Information about these items should not be disclosed without the express consent of the author or originator.

See Data Protection Policy and Confidentiality Policy Compliance Note for more information.

5.5 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

You must actively listen to residents and take their views, concerns and complaints seriously, ensuring they are responded to appropriately and in a timely manner

You must act with empathy and respect, and must not use language or behaviours that could be perceived as dismissive, stigmatising or lacking in professionalism

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

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

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

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

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
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
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.

5.6 Reporting Concerns

The principle
All individuals have a responsibility to challenge poor behaviour, unsafe practice or decisions that do not align with this policy. You must report to the appropriate person within Bernicia Group any reasonable suspicions you have about possible wrongdoing in line with the relevant associated policies and procedures.

Expected of all
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 policy or any associated policies or relevant legislation including health and safety.

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

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.

See Speak Up – Whistleblowing Policy for more information.

6. 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 housing association. Respectful, fair and empathetic behaviour is essential to building trust, maintaining effective relationships and supporting a healthy organisational culture.

6.1 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
You must treat everyone you meet in the performance of your role with equal respect, care, politeness, empathy and consideration.

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

You must promote, through your own behaviours, an organisational culture that is welcoming, accepting and accommodating to people of all backgrounds, cultures, and personal and protected characteristics.

You must not harass, bully, or attempt to intimidate any person, use threatening or aggressive behaviour or engage in behaviour, including subtle or repeated behaviours, that could reasonably make others feel marginalised, threatened, patronised or dismissed You must seek to avoid microaggressions in your speech and behaviour.

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

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 respecting confidentiality.

See Bullying & Harassment Policy and Equality, Diversity & Inclusion Policy for more information.

Expected of Staff

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

6.2 Professional Relationships

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

Expected of all
You must not ask or encourage the commitment of wrongdoing, including any breach of this policy.

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 Bernicia whether involved residents, board members or staff) on an appropriately professional footing.

You must challenge language or behaviour that reinforces stigma about residents or social housing.

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
Your relationships with colleagues and involved tenants must be constructive and professional.

You must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies, and objectives of Bernicia Group.

Expected of board members and involved tenants
Where it is necessary to raise issues of colleagues, board, or contractor performance, these must be raised constructively and through the appropriate channels.

You must not undermine or appear to undermine the authority of a senior officer in their dealings with a more junior member of staff.

You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with members of staff.

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

You must behave in a professional manner, always maintaining independence and integrity. This will include avoiding, in a professional setting, inappropriate personal familiarity with board members and involved tenants.

You must not use informal channels to lobby or influence board members or involved tenants on matters of Bernicia Group business.

You must not knowingly mislead the group board or any of Bernicia Group's subsidiary boards, committees, or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully.

See Professional Boundaries Policy for more information.

7. Taking Responsibility for the Impact of your Actions

You have a responsibility while on the housing association's business to consider the immediate and longer-term impact of your actions and to be accountable for them

7.1 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
You must consider how your conduct, actions and decisions may impact on residents.

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

You must respond constructively to feedback about your actions, decisions and performance, by whoever this is provided.

7.2 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
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.

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

See Health & Safety Policy or more information

7.3 Environment and Sustainability

The principle
Within your role at Bernicia Group, you must strive to avoid or reduce possible negative impact on the environment and sustainability

Expected of all
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.

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

Expected of board members
You should consider the long-term environmental impact of your decisions.

7.4 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 housing association itself from harm.

You must use available information and data to support your decisions and ensure your actions are informed, fair and consistent.

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

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

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 housing association's values and responsibilities.

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.

You must take reasonable care to ensure information you create, use or share is accurate, complete and up to date

8. 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.

8.1 Learning And Development

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

Expected of all
You must play an active part in Bernicia Group's supervision and performance appraisal processes as applying to you.

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

You must take responsibility for your own professional development and where your role requires continuing professional development you must keep this up to date and maintain required records/

Where relevant, you must work towards and maintain appropriate professional qualifications aligned to your role. Bernicia will support colleagues, to achieve qualifications in line with regulatory requirements

You must make your personal training, and development needs relevant to your role known to the organisation.

Unless there are exceptional reasons, you must attend learning and development events as required.

Expected of board members
You must keep your knowledge up to date in those areas in which you are a specialist, as well as keeping abreast of any matters relating to Bernicia Group and the wider housing sector.

8.2 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
You must take care to understand the responsibilities of your role, including relevant legal, regulatory and policy requirements.

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

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

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

8.3 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
You must demonstrate openness to learning from a range of opportunities, including resident scrutiny, complaints and other feedback.

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

9. Breaches of this Policy

Any alleged breach of this policy will be considered in accordance with the relevant Bernicia Group procedures. For colleagues, this may include investigation under the Disciplinary Policy. Complaints concerning Board Members will be managed in accordance with the procedure set out in Appendix 2.

Anyone who becomes aware of a potential breach should report their concerns through the appropriate channels, including the Speak Up (Whistleblowing) Policy, Anti-Fraud, Bribery and Corruption Policy, Grievance Framework or other applicable reporting procedures.

10. Monitoring

Compliance with this policy is supported through induction, mandatory training, appraisal, supervision and governance assurance processes.

The policy will be communicated to all colleagues, Board Members and involved tenants and will be published on Bernicia's website. Policy readership may be assigned and monitored through Bernicia's policy management arrangements.

The policy forms part of Bernicia's probity framework and is included within induction and refresher training for board members, involved tenants and colleagues.

Completion of required training is monitored by the Organisational Development Team.

Compliance with this policy and the behaviours it sets out will be considered as part of individual performance management and appraisal processes, including assessment against Bernicia's values. Board appraisal arrangements will also include consideration of compliance with this policy

Managers are responsible for promoting the standards contained within this policy and for identifying and addressing concerns relating to conduct, competence or capability at an early stage. Where appropriate, support, training, supervision or formal action may be taken

The Board will receive periodic assurance regarding compliance with the policy through governance reporting and oversight arrangements

11. Definitions

Word/Phrase	Definition
Code of Conduct	Simply described, a Code of Conduct sets out the behaviours, or standards of conduct, that are expected of people who are involved in the work or decision-making of a housing association.
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 the Bernicia'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 at Bernicia and how residents experience the services they receive.
Housing Association	Independent, non-profit making, social landlords, who we expect to be the main adopters of the code.
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, Bernicia's business activities.
Known relationship	For the purposes of this policy, 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 policy, 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 policy, we use the term 'residents' to include residents, tenants, leaseholders, shared owners and users of other services provided by the housing association. Organisations with customers who are not residents (e.g. recipients of other services) may wish to amend the term to read 'residents and other customers'.
Staff member and staff	Includes Bernicia's 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 Bernicia 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.

Effective From: **September 2026**

Applicable To: This policy and its procedures apply to all members and colleagues of Bernicia Group, including Board Members, Trustees, Independent Committee Members, Directors, Involved Tenants, and colleagues whether full-time, part-time, fixed-term, casual employees, and volunteers of Bernicia, and subsidiaries of the group.

Associated Documents: The following resources support the Standards of Behaviour policy and Bernicia colleagues to deliver high standards of conduct, behaviour and professionalism in line with organisational and regulatory requirements.

- National Housing Federation Code of Conduct 2026
- Anti-Fraud, Bribery and Corruption Policy
- Anti-Money Laundering Policy
- Bullying and Harassment Policy
- Confidentiality Policy Compliance Note
- Data Protection Policy
- Disciplinary Policy
- Equality, Diversity and Inclusion Policy
- Gifts & Hospitality Policy Compliance Note
- Health & Safety Policy
- Information & Security Management Policy
- Professional Boundaries Policy
- Probity Framework
- Social Media Policy
- Speak Up - Whistleblowing Policy

Equality, Diversity & Inclusion: An ED&I Assessment was completed in January 2026. Please contact the Governance team if you require a copy.

Approved By: **Group Board September 2026**

Policy Author: Head of Governance

Policy Owner: Chief Executive

Next Review: **September 2029**

Reference Number: **POL-0128**

Change Control

Version Number	Effective Date	Amendment made by	Version approved by	Description of changes
V7.0	July 2026	Head of Governance	Chief Executive	Major amendments - updated to reflect the new NatFed Code of Conduct which is in line with the new Competency and Conduct Standard
V6.0	January 2026	Governance and Policy Advisor	Head of Governance	Transition to new policy template. Minor amends to job titles updates and policy titles.
V5.1	March 2025	Head of Governance	Director of Corporate Governance	Addition of Board member specific expectations re confidentiality, addition of change control section.
V5.0	December 2024	Policy & Governance Advisor	Director of Corporate Governance	Reference to Social Networking Policy changed to Social Media Policy