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Document Type	Policy- L1		

Group Code of Conduct including Probity Standard and Declarations of Interests, Gifts and Hospitality

1.0 Overview and Scope

- 1.1 This Code of Conduct, including Probity Standard and Declarations of Interests, Gifts and Hospitality ('the Code') applies to all colleagues, Non-Executive Directors, Committee Members (which includes Independent Committee Members and Customer Members) and Involved Customers (including members of Customer Voice), who are currently employed/appointed or have been within the previous 12 months.
- 1.2 It also explains where appropriate the 'rules for internal operations' in regards to Probity in order to ensure the honesty and integrity of processes and decisions within the Coastline Group, where individuals receive a benefit (such as a job, a house or a contract), from the Group and expands upon the provisions of the Group Standing Orders.
- 1.3 This Code cannot cover every situation in which you may find yourself as you perform your role. You need to apply good judgement and act with integrity even where this Code does not contain specific requirements. It is always important to consider how any action taken or decision made aligns with Coastline's purpose and values, and what impact it may have upon customers and Coastline's reputation.
- 1.4 Involved Customers (described as Involved Residents by the National Housing Federation [NHF]) – are residents, tenants, leaseholders, shared owners and users of other services provided by Coastline who are formally involved in delivering, or scrutinising Coastline's activities. It is intended that this Code applies to those customers who attend Board or Committee Meetings or Customer Voice members acting as a Scrutiny Panel.
- 1.5 This Code does not apply to:
 - Volunteers, governance of whom comes under the Volunteer Policy.
 - Contractors or suppliers, where other specific Codes of Conduct may apply.
- 1.6 This Code applies to the Coastline Group and any references to Coastline throughout the document are deemed to apply to all parts of the Group.

Fit and Proper Persons Requirements

- 1.7 All Non-Executive Directors, Executive Directors, and Committee Members must meet Coastline's fit and proper person requirements as a condition of appointment and ongoing service. This includes completing a Fit and Proper Person Declaration, which covers matters such as bankruptcy, criminal convictions, regulatory breaches, and other relevant disqualifications.
- 1.8 Coastline's requirements reflect the standards set by the Regulator of Social Housing, the Charity Commission, and (where applicable) the Care Quality Commission (CQC). These bodies require that all office holders are able to demonstrate their suitability and integrity, and are not disqualified by law or regulatory action.

- 1.9 The organisation will carry out appropriate checks and may require further information or evidence to confirm eligibility. The declaration must be completed on appointment and reviewed annually, or as circumstances change.

2.0 Background / Introduction

- 2.1 The Board has adopted the NHF Code of Conduct 2022 (and any subsequent iterations) and this Coastline Code incorporates the NHF Code in its entirety.

- 2.2 For the purposes of this Code, 'People with whom you are closely connected' in broad terms means your family, relatives or business partners as well as businesses in which you have an interest through ownership or influence, for example,

- A relative by blood, marriage or partnership. This includes your spouse or unmarried partner or civil partner, children (including step-children and fostered or adopted children), parents and their partners, siblings and their partners, grandchildren, and grandparents
- Anyone living in the same household of a colleague, non-executive director, committee member or involved customer.
- Close friends where there is or could be an actual or perceived conflict of interest; the onus is on the individual to disclose the relationship where there is any doubt. 'Close friends' includes individuals with whom you have a close personal relationship, such that a reasonable person might perceive your judgement to be influenced. This may include long-standing personal friends, individuals with whom you regularly socialise or share significant personal matters, or where there is emotional closeness, mutual dependency or loyalty. The test is not intent, but perception. Where there is any doubt, the relationship must be disclosed.

- 2.3 This document reflects the same structure as the NHF Code, being in four main themes, with the principle behind each theme described followed by detailed expectations:

- **PART I: Acting in the best interests of Coastline and its Customers**
 - Meeting your responsibilities
 - Representing Coastline
- **PART II: Behaving with integrity**
 - Conflicts of interests
 - Bribery, gifts and hospitality
 - Funds, resources and personal benefit
 - Confidentiality
 - Reporting concerns
- **PART III: Conducting yourself professionally and treating others well**
 - Respect for others
 - Working with customers
 - Professional relationships
 - Learning and Development
- **PART IV: Protecting yourself, other people and the environment**
 - Health, safety and security
 - Protecting the environment

- 2.4 Under each theme it is made clear which of these expectations apply to everyone and which are specific to either colleagues, non-executive directors, committee members or involved customers.

3.0 PART I: Acting in the best interests of Coastline and its Customers

Meeting your responsibilities

The principle

- 3.1 You must fulfil your duties and obligations responsibly, acting at all times in good faith and in the best interests of Coastline and for the delivery of its strategic objectives.

Expected of all

- 3.2 You must uphold Coastline's values, namely:
- To put our customers first;
 - Being open, honest and accountable;
 - Strive to be the best; and
 - To value each other.
- 3.3 You have a general responsibility to act in the Coastline's interests at all times, rather than your own or other's interests and uphold the highest standards of integrity and ethics.
- 3.4 You must ensure that you are familiar with this Code, Coastline's policies and procedures applicable to your role, and that you adhere to them at all times.
- 3.5 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.
- 3.6 In carrying out your role, you must always seek to further the delivery of the Coastline strategic objectives, reflecting Coastline's desired culture.
- 3.7 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.
- 3.8 You must consider the impact of your actions on the safety and wellbeing of colleagues and customers.

Expected of Board and Committee Members

- 3.9 This Code should be read in conjunction with Coastline's Group Standing Orders which detail the seven principles of public life recommended by the Nolan Committee – selflessness, integrity, objectivity, accountability, openness, honesty and leadership.
- 3.10 You are expected to make every effort to attend meetings, but if unable to attend are asked to ensure that their apologies are forwarded to the Chair and Group Company Secretary in accordance with the Group Standing Orders.
- 3.11 You are expected to read agenda papers before meetings and to contribute to discussion. You are also entitled if appropriate to raise items for inclusion on the agenda, with the Board or Committee Chair, in accordance with the Coastline's Standing Orders.
- 3.12 You must respect the role of the Chair, listen to and acknowledge the contributions of others.
- 3.13 You must respect the principle of collective decision-making and corporate responsibility.

- 3.14 You must ensure that you declare to Coastline any relevant personal relationships, employment and other appointments you hold, if you are a Coastline customer or are closely connected with a customer, and any other actual or perceived conflicts of interest. You must also ensure these do not interfere with your ability to perform or conflict with your role as a Board Member and/or Committee member (see Appendix 5).
- 3.15 As Charity Trustees, Board members should act in Coastlines best interests (for example dealing with conflicts of interest), manage Coastlines resources responsibly (for example implement appropriate financial controls and manage risks) and act with reasonable care and skill (for example take appropriate advice when needed).

Commitment to Non-Executive Directors and Committee Members

- 3.16 Coastline considers membership of the Board or Committee should be a mutually rewarding relationship. In return for the commitment of Non-Executive Directors and Committee members, Coastline will invest in their training, support and personal development. To assist in the performance of their duties, Coastline will:
- Treat Non-Executive Directors and Committee members with respect;
 - Ensure private and confidential information about Board and Committee members and their professional lives is kept on that basis;
 - Recognise the privileged nature of sensitive correspondence between Board and Committee members and Coastline and ensure its confidentiality;
 - Undertake an annual training needs assessment;
 - Provide tailored induction programmes for new Board and Committee members;
 - Arrange an annual appraisal to assist Board and Committee members in planning their personal and professional development;
 - Offer opportunities for Board and Committee members to attend conferences and seminars relevant to the Coastline's work;
 - Promptly reimburse expenses in accordance with the Coastline's policies; and
 - Whenever possible, ensure that agendas, reports and minutes are accurate and circulated in accordance with the Coastline Standing Orders.

Expected of Colleagues

- 3.17 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.
- 3.18 You must ensure that you declare via SafeHR any relevant close connections, secondary employment and other appointments you hold, if you are a Coastline customer or are closely connected with a customer, and any other actual or perceived conflicts of interest. You must also ensure these do not interfere with your ability to perform or conflict with your role.

Commitment to Colleagues

- 3.19 Coastline considers that it has a responsibility to you as a member of its staff. In return for your commitment, Coastline will invest in your training, support and personal development. To assist you in the performance of your duties, Coastline will:
- Treat you with respect;
 - Value Equality, Diversity & Inclusion;
 - Ensure private and confidential information about you is kept on that basis;
 - Undertake an annual training needs assessment;
 - Provide tailored induction programmes for new staff;

- Regularly meet to assist you in planning your personal development and maximising your potential;
- Ensure that you are paid promptly and accurately; and
- Seek to ensure that it is, in all respects, a brilliant place to work.

Expected of Involved Customers

- 3.20 All Involved Customers hold collective responsibility for decisions made in meetings. In the event that a customer disagrees with any decision made, they agree to abide by it and not to do or say anything to undermine the decision made.
- 3.21 You must ensure that you declare to Coastline any relevant close connections, relationships, employment and other appointments you hold, if you are a Coastline customer or are closely connected with a customer, and any other actual or perceived conflicts of interest. You must also ensure these do not interfere with your ability to perform or conflict with your role.

Representing Coastline

The principle

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

Expected of all

- 3.23 In representing Coastline, you must act in accordance with its values, policies and goals.
- 3.24 You must not conduct yourself in a manner that could reasonably be regarded as bringing Coastline into disrepute.
- 3.25 You must not make derogatory, false or otherwise damaging comments, in person or through any medium, about Coastline or any person, service or organisation connected with it.
- 3.26 You must not seek to officially represent the views or position of Coastline without prior authority.
- 3.27 You must adhere to Coastline's policies in the use of email, intranet and internet services including social media.
- 3.28 When representing Coastline through any medium, including social media, you must at all times act with professionalism.
- 3.29 Where any personal social media accounts refer to your role with Coastline, you must make it clear in what capacity you are communicating.
- 3.30 If you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect Coastline or present an actual or perceived conflict of interest, you must obtain prior consent. Such consent must not be unreasonably withheld unless your activity poses a material risk to Coastline or would impact significantly on your ability to perform your role.

Expected of Board and Committee Members

- 3.31 Coastline operates in a highly competitive field and whilst, non-political itself, is in a political environment. It is therefore expected that Board and Committee members will respect the confidentiality of information gained by them in their capacity as Board or Committee member and will at all times act in Coastlines interests. Any individual political affiliations should be declared on appointment, when requested or promptly as and when they arise, and be kept entirely independent of Coastline activity.
- 3.32 Individuals with a conflict should not take part in Board and Committee 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.

4.0 PART II: Behaving with integrity

Conflicts of interests

The principle

- 4.1 You must take all reasonable steps to make sure that no conflict arise, or could reasonably be perceived to arise, between your duties to Coastline and your personal interests, other duties and relationships.
- 4.2 You must disclose any direct or indirect pecuniary (financial) interest or other interests which are not pecuniary, but which could influence judgement or give the impression that you are acting for personal motives. If the declaration is made at a meeting, you should withdraw from that part, unless specifically invited to remain, or where allowable under the Articles of Association.
- 4.3 Individuals with a conflict should not take part in discussions and decisions relating to that conflict and should be prepared to resign or change roles if the conflict is material or long-standing, and in the opinion of the Board (for Non-Executive Directors, Committee Members, or Executive Directors) or executive team (for colleagues) cannot be managed appropriately.
- 4.4 A register of interests for non-executive directors, committee members and executive directors is maintained by the Group Company Secretary. A summary is published on the Coastline website in accordance with transparency and UK GDPR requirements.

Expected of all

- 4.5 The Group Standing Orders, Group Contract Rules, Coastline policies and this Code provide restrictions which apply to you as a colleague, non-executive director, committee member, involved customer or your close connections. These restrictions may continue to apply for 12 months after your involvement with Coastline has ended. If you require any advice, please contact the Group Company Secretary.
- 4.6 If you have any doubt about whether an interest could present an actual or perceived conflict of interest, you must ensure that you formally raise the matter with your line manager, or with the Group Company Secretary.
- 4.7 You must formally declare to Coastline, on appointment, when requested and promptly as and when it arises, any interests which may, or may be perceived to or may in the future, conflict with the duties of your role.
- 4.8 You must complete an annual declaration when requested, via Safe HR for colleagues, or via the Group Company Secretary for non-executive directors, committee members and executive

directors, even if only to confirm you have no actual or perceived interest to declare. Declarations by Involved Customers (e.g. scrutiny panel members who are not also a Customer Member of a Committee) make their declarations to the Community Investment Team.

- 4.9 You must declare any known relationship to a connected person (referred to in 2.3 above), applying for or performing a role within or for Coastline and must not be involved in their appointment, performance management or reward. This includes declaring a relationship that develops between colleagues. Appendix 1 outlines the action to be taken should a person closely connected with a colleague or someone who has been employed in the previous 12 months apply for a role within Coastline, including as a self-employed contractor.
- 4.10 Should you start or end a relationship with a colleague, non-executive director, committee member, involved customer or a Coastline Customer this must be declared at the earliest opportunity to the relevant Director / Chair in order that the situation can be managed. These declarations are recorded by the Group Company Secretary in the confidential Staff Register of Interests.
- 4.11 You must declare any close connection (see Section 2.3 above) to a current customer or potential customer (i.e. people who have started an application process for a Coastline home) of Coastline. You must not be involved in decisions relating to their relationship with Coastline or seek or accept preferential treatment for them. Appendix 2 outlines the arrangements relating to Housing, including lettings, subletting, shared ownership, sale or disposal properties, of colleagues, non-executive directors, committee members or involved customers (or who have been within the previous 12 months) and those closely connected to them.
- 4.12 You must declare any known relationship to a person or organisation seeking appointment as a contractor or supplier to Coastline and must not be involved in their appointment, performance management or reward (see also Group Standing Orders and Group Contract Rules)
- 4.13 If you instruct a contractor to carry out works in your personal life, the onus is on you to find out whether they are used by the Group. If they are, you must ensure that the Group Company Secretary or their deputy is informed and, where required, appropriate probity approvals are sought. Due to potential reputational risk, it is Coastline's preference for colleagues, non-executive directors, committee members, and involved customers not to use Group contractors for personal use. However, should you wish to use a certain contractor due to emergency, regional limitations or differences in pricing, this needs to be declared before any works take place, or if in an emergency as soon as practicable thereafter.
- 4.14 You must not under any circumstances seek any discount due to your association with Coastline. You may receive a discount which is available to the general public, or more widely to colleagues within the Group provided it has been openly considered and approved through a formal procurement process, but nothing more.
- 4.15 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.

Bribery, gifts and hospitality

The principle

- 4.16 In your role with Coastline, 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 organisations. You must not seek or accept preferential treatment in the provision of benefits such as housing accommodation, employment or preferential rates or treatment if engaging contractors in a personal capacity (see section 4.13 and Appendices 1 - 4).

- 4.17 Coastline from time to time may make an award or provide a gift to colleagues. This may, for example, include long service awards, retirement gifts, a leaving presentation or a bunch of flowers following an operation etc. Appendix 3 outlines the arrangements regarding gifts and awards made or given by Coastline to colleagues.

Expected of all

- 4.18 You must not solicit or seek gifts or hospitality or other benefits for personal gain.
- 4.19 Where there is a clear opportunity to do so, the question of whether to accept the gift or hospitality should be raised with your Manager or the Group Company Secretary or their nominated deputy in advance of acceptance.
- 4.20 Any gifts or hospitality offered to or by you must be either declared, and where appropriate declined according to Coastline's policies and the guidance contained in Appendix 4.
- 4.21 All gifts and hospitality, unless purely of token value (up to £10), given and received, and whether or not accepted, must be notified to the Group Company Secretary or their deputy for recording in the Register of Probity, Gifts and Hospitality
- 4.22 Personal gifts of cash, vouchers or gifts of a significant monetary value from a customer, supplier or contractor must not be accepted.
- 4.23 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 Group Company Secretary in line with Coastline's policies.

Funds, resources and personal benefit

The principle

- 4.24 You must not misuse Coastline's funds or resources, or seek preferential treatment for your own personal benefit.
- 4.25 Non-contractual or ex gratia payments to colleagues should be avoided, and where, on the rare occasion they are considered appropriate they will be paid in accordance with the Group Standing Orders and Scheme of Delegation.

Expected of all

- 4.26 Ensure that your private and personal financial interests do not influence your decisions and that you do not use your position as a member of staff, Non-Executive Director, Committee Member, or involved customer for material gain of any sort
- 4.27 Ensure that you disclose precisely any direct or indirect pecuniary (financial) interest or other interests which are not pecuniary, but which could or be perceived to influence your judgement or give the impression that you were acting for personal motives.

- 4.28 You must ensure that Coastline's funds and resources are used properly and efficiently, in accordance with the Group Standing Orders, Group Contract Rules, and Group Financial Regulations.
- 4.29 Your procurement decisions must be guided by Coastline's procurement framework including Group Contract Rules and fairness in decision-making, in line with relevant law and regulations.
- 4.30 You must take all reasonable measures to protect Coastline's funds, resources, property and assets from fraud, theft, damage and misuse.
- 4.31 If you claim reimbursement for any expenses you must do so in line with Coastline's policies and procedures.

Expected of Non-Executive Directors, and Committee Members

- 4.32 Other than duly agreed remuneration in line with the relevant policy, non-executive directors, and committee members are not allowed to be paid for any services provided to Coastline.

Confidentiality

The principle

- 4.33 You must process information in accordance with UK General Data Protection Regulations and the Data Protection Act 2018 (as amended) and Coastline's policies and procedures.

Expected of all

- 4.34 You must not disclose, without the required permission and authority, any personal data about customers, colleagues or third-parties.
- 4.35 You must not disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left Coastline or stepped down from your position.
- 4.36 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 Coastline, unless you are doing so in accordance with Coastline's Whistleblowing – Confidential Reporting Policy.
- 4.37 You must not prevent another person from gaining access to information to which they are entitled to by law.
- 4.38 You are expected to exercise judgement and prudence in using or accessing social networking sites or other social media, so that Coastline's interests and reputation are not put at risk and Colleagues are not disadvantaged (see also the Group Social Media Policy).

Reporting concerns

The principle

- 4.39 You must report to the appropriate person within Coastline any reasonable suspicions you have about possible wrongdoing in line with Coastline policies, including, where appropriate the Whistleblowing – Confidential Reporting Policy.

Expected of all

- 4.40 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.

- 4.41 If a concern is reported to you about possible wrongdoing, you must respond in accordance with the relevant Coastline policy or seek advice from an appropriate colleague.
- 4.42 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.
- 4.43 You must not victimise or disadvantage any person who uses or intends to use Coastline's Whistleblowing - Confidential Reporting Policy to report actual or alleged wrongdoing. Coastline will not tolerate harassment, victimisation or retaliation towards any person for raising concerns on the basis of reasonable belief or objecting or refusing to participate in any act or practice that they honestly believe to be a violation of law or misconduct. Coastline will treat this as a disciplinary offence for colleagues or breach of the Non-Executive Director, Independent Committee Member or Customer Member Appointment Agreement.

Expected of Colleagues

- 4.44 If a colleague has a complaint about a Non-Executive Director's Committee Member's, or Involved Customer's conduct, they would normally approach their line manager who in turn would escalate it to the Chief Executive Officer or Group Company Secretary to raise the matter with the Chair, if necessary.

Expected of Board, Committee Members and Involved Customers

- 4.45 If a Non-Executive Director or Committee Member has a complaint about another's conduct, they should raise it with the Chair or Vice Chair, who would normally discuss the matter with the Chief Executive Officer and/or Group Company Secretary, before raising it (together if appropriate) with the individual concerned, citing any apparent breach of this Code of Conduct.

5.0 PART III: Conducting yourself professionally and treating others well

Respect for others

The principle

- 5.1 You must treat all others with respect and consideration, in line with Coastline's values.

Expected of all

- 5.2 You must treat everyone you meet in the performance of your role with equal respect, care and consideration.
- 5.3 You must show respect for individuals' chosen identities.
- 5.4 You must promote, through your own behaviours, an organisational culture that is welcoming, accepting and inclusive to people of all backgrounds, cultures and personal and protected characteristics.
- 5.5 You must not harass, bully or attempt to intimidate any person, or use threatening or aggressive behaviour or other discriminatory behaviours. You must seek to avoid microaggressions in your speech and behaviour. (Microaggression is the expression used in the NHF Code for "brief and

commonplace verbal, behavioural or environmental slights that may communicate hostile, derogatory, or negative attitudes towards certain groups of people.”)

- 5.6 You must not display materials in your workplace or use language in the performance of your role which other people might reasonably find offensive.
- 5.7 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

Working with Customers

The principle

- 5.8 You must be professional, fair and courteous in all your dealings with customers.

Expected of all

- 5.9 You must seek and value views from customers when making decisions that will affect them.
- 5.10 You must not allow any personal relationship with customers to influence how you discharge your role and responsibilities. You must also ensure you have appropriately declared any relationship for transparency and to ensure any actual or perceived conflict of interest is managed.
- 5.11 You must not give personal gifts or financial loans to, or receive financial loans or gifts of money from, customers, except in your personal capacity where they are closely connected to you, this relationship has been appropriately declared and action has been taken to manage any actual or perceived conflict of interest.
- 5.12 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 Coastline's financial policies, procedures and controls to ensure appropriate handling of any and all funds.
- 5.13 You must not invite or influence a customer to make a will or trust under which you are named as executor, trustee or beneficiary, unless they are a person who you are closely connected to and this has been appropriately declared and action has been taken to manage any actual or potential conflict of interest.
- 5.14 When working with customers, in particular vulnerable customers, colleagues should follow the requirements of the Professional Boundaries guidance and Coastline policies.

Professional relationships

The principle

- 5.15 Non-Executive Directors, Committee 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

- 5.16 You must not ask or encourage wrongdoing, including any breach of this Code.

Expected of Board and Committee Members

- 5.17 Your relationships with colleagues and Involved Customers must be constructive and professional.
- 5.18 You must set an example by demonstrating the highest standards of integrity and ethics and your alignment with the values, policies and objectives of Coastline.

Expected of Non-Executive Directors, Committee Members and Involved Customers

- 5.19 Where it is necessary to raise issues of staff, Board, Committee or contractor performance, these must be raised constructively and through the appropriate channels.
- 5.20 You must not undermine or appear to undermine the authority of a senior officer in his or her dealings with a more junior member of staff.
- 5.21 You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding inappropriate personal familiarity with any member of staff.
- 5.22 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 Colleagues

- 5.23 You must behave in a professional manner, maintaining independence and integrity at all times. This will include avoiding, in a professional setting, inappropriate personal familiarity with, colleagues, Non-Executive Directors, Committee Members and Involved Customers.
- 5.24 You must not use informal channels to lobby or influence Non-Executive Directors, Committee Members or Involved Customers on matters of Coastline's business.
- 5.25 You must not knowingly mislead the Board (including subsidiary Boards) or any of Coastline's committees or panels. In presenting information, you must set out the facts and relevant issues and risks truthfully and transparently.

Learning and development

The principle

- 5.26 In partnership with Coastline, you must take responsibility for your own learning and development, regularly updating and refreshing your skills and knowledge.

Expected of all

- 5.27 If you are new to Coastline or have taken a new role, you will be expected to participate in an induction programme.
- 5.28 You must play an active part in Coastline's supervision and performance management processes as applying to you.
- 5.29 You must offer open and constructive feedback to others and invite feedback about your own performance.

- 5.30 You must make your personal and professional training and development needs relevant to your role known to Coastline.
- 5.31 Where your role requires the membership of a professional body you must undertake the appropriate continuing professional development to ensure your ongoing membership.
- 5.32 Unless there are exceptional reasons, you must attend learning and development events as required.

Expected of Board and Committee Members

- 5.33 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 Coastline and the wider housing and healthcare sector as appropriate.

6.0 PART IV: Protecting yourself, other people and the environment

Health, safety and security

The principle

- 6.1 Your conduct, actions and decision making must promote the health, safety, security and wellbeing of yourself or others.

Expected of all

- 6.2 You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk.
- 6.3 If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or a group of individuals connected with Coastline, you must report this immediately through the appropriate channels, in accordance with the Safety, Health and Environment Policy.

Protecting the environment

The principle

- 6.4 Within your role at Coastline, you must strive to avoid or reduce possible negative environmental impacts.

Expected of all

- 6.5 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.

Expected of Board and Committee Members

- 6.6 You should consider the long term environmental impact of your decisions.

7.0 Links to other Policies

The following related policies, procedures and guidance are also relevant:

- Acceptable Use Policy;
- Business Ethics Anti-Fraud Bribery and Money Laundering Policy
- Customer Feedback (Compliments and Complaints) Policy;
- Data Protection Policy
- Equality and Diversity Policy;
- Procurement Framework
- Group Contract Rules;
- Group Financial Regulations
- Group Social Media Policy;
- Group Standing Orders;
- Professional boundaries guidance
- SHE Policy;
- Safeguarding Adults Policy;
- Volunteer Policy; and
- Whistleblowing Policy

Declaration

I confirm that I will observe the requirements of Coastline's Group Code of Conduct, including Probity Standard and Declarations of Interests, Gifts and Hospitality, and its future iterations, and understand that, if I breach those requirements or their spirit, I may be subject to disciplinary action.

Name:

Signed:

Date

Appendix 1 – Probity Approvals for Employment and re-employment

1 Employment of people closely connected to employees, non-executive directors, committee members and involved customers

1.1 Given the demographic within and geography of Cornwall, it is inevitable that from time-to-time people who are closely connected to existing colleagues, non-executive directors, committee members or involved customers may apply for a job within the Coastline Group. These will require a Probity Approval.

1.2 If such an application arises for a role within the same team (meaning under the same Head of Service, or Assistant Director where no Head of Service, line of management) as the existing employee the application will not normally be considered. However, where this may significantly disadvantage the applicant due to available job opportunities, or Coastline due to available skills within the community, the application should be dealt with following the normal full and fair competitive recruitment process ensuring that no person having any personal knowledge of the applicant plays any part in the assessment or decision.

In addition, suitable management control measures should be put in place and recorded, to mitigate any potential for a conflict of interest. Such measures must be included in the approval request submitted ahead of any employment being offered.

1.3 Any change in employment status of a closely connected person from Fixed Term to permanent should prompt a further approval request to ensure any changes in measures agreed can be considered and recorded. Due consideration shall also be given during internal movement of existing closely connected colleagues to ensure any potential conflicts of interest have control measures in place.

1.4 If the application is for a role elsewhere within the Group (i.e. different Head of Service line of management), the application can be considered and dealt with following the normal full and fair competitive recruitment process ensuring that no person having any personal knowledge of the applicant plays any part in the assessment or decision.

1.5 Before any job offer is made to someone identified as being 'closely connected' it must be approved by at least two members of the Executive Team one of whom must be the Chief Executive (CEO) (or Deputy CEO in the CEO's absence).

1.6 If such an application occurs for a position at the level of senior manager (Senior Leadership Team [SLT]) or above the matter will be referred to the Group Board **before confirming** short-listing for a decision on whether to proceed with the application or not.

2 Re-employment of former employees or engagement as self-employed contractors

2.1 Engagement of former employees within 12 months as either employees or self-employed contractors needs to follow due process and be subject to close scrutiny and approval of two members of the Executive Team, one of whom must be the Chief Executive (or Deputy CEO in the CEO's absence).

2.2 Should such an engagement be at the level of senior manager (SLT) or above, or following a planned retirement at any level, the matter will be referred to the Board for a decision on whether to proceed or not.

Appendix 2 – Probity Approval Processes Housing Transactions Involving Staff, Non-Executive Directors, Committee Members, and Closely Connected Persons

1.0 Housing, Including Lettings, Shared Ownership, Sale or Disposal Properties, of Colleagues, Non-Executive Directors or Committee Members (or who have been within the previous 12 months) and those closely connected to them

- 1.1 The basic principle here is that all applications must follow the normal agreed process namely that:
- Consideration of the application is based solely on published applications criteria;
 - No person having any direct personal knowledge of the applicant plays any part in the assessment decision; and
 - Requirements of the Tenancy Standard in allocations and lettings are met, namely that registered providers shall let their homes in a fair, transparent and efficient way.
- 1.2 Should an applicant be a colleague or closely connected to a colleague (or who has been in the previous 12 months) this must be declared and be subject to close scrutiny and Probity Approval by two members of the Executive Team, one of whom must be the Chief Executive (or Deputy CEO in the CEO's absence).
- 1.3 Should the applicant be, or is closely connected, to:
- a colleague in the housing or development teams;
 - a senior manager (SLT) or above;
 - a non-executive director, committee member or involved customer (or who has been in the previous 12 months)
- the matter will, in addition, be referred to the Board for Probity Approval.
- 1.4 Whilst such an allocation is likely to be approved providing due process has been followed, the need to demonstrate fairness and propriety is absolutely paramount.
- 1.5 Where colleagues, non-executive directors or committee members are customers of Coastline (as declared annually or as the interest arises) there is potential for abuse of position and unfair advantage, for example, home improvements, access to the Sustainability Fund, management of arrears or related financial or in-kind support services etc. When such services are offered or provided the relevant Assistant Director (or Head of Service if no Assistant Director) must take appropriate steps to avoid such abuse of position. This must include completing a Probity Form and obtaining authorisation from two directors. Such approvals will be recorded on the Register of Probity, Gifts and Hospitality.

2.0 Subletting by Staff, Non-Executive Directors or Committee Members

- 2.1 Where a member of staff, Board or Committee member, who is also a Coastline customer wishes to sublet their Coastline property, this must be declared in advance and is subject to Probity Approval by two members of the Executive Team, one of whom must be the Chief Executive (or Deputy CEO in the CEO's absence).
- 2.2 Approval will be granted on a case by case base, ensuring compliance with all relevant policies and statutory requirements, and where there is no actual or perceived conflict of interest or reputational risk to Coastline.
- 2.3 All such approvals must be recorded in the Register of Probity, Gifts and Hospitality.

Appendix 3 – Gifts and awards given by Coastline to colleagues

- 1.1 Awards, gifts, and hospitality provided by Coastline are intended to recognise contribution and service, not to confer personal benefit or influence. All arrangements must be transparent, fair, and consistent with Coastline's values and charitable status. Coastline recognises the value of acknowledging colleagues' contributions through awards, gifts, and hospitality. All such recognition must be:
 - Made strictly in accordance with approved policies (e.g., Long Service Awards Policy, Retirement Policy, Excellence Awards Policy).
 - Transparent, fair, and consistent.
 - Not regarded as gifts or hospitality for the purposes of the Code, provided they are made under an approved policy.
- 1.2 This Appendix applies to:
 - Awards, gifts, and hospitality provided by Coastline to colleagues, Non-Executive Directors, Committee Members, and Involved Customers.
 - Events such as retirement functions, long service awards, excellence awards, and team celebrations.

For clarity, this policy does not apply to bonuses or higher performance awards made under the relevant pay policies.
- 1.3 All awards, gifts, and hospitality must:
 - Comply with the relevant Coastline policies and procedures.
 - Not exceed the financial limits set out in those policies and procedures, or do not exceed £300 per person per year.
 - Be authorised in advance where required (e.g., by the relevant Executive Director or CEO, or by the Executive Team as a whole if an organisation-wide initiative).
 - Be recorded and reported as specified in the relevant policy.
2. **Financial Limits and Authorisation**
 - 2.1 Awards and gifts provided under approved policies (e.g., Long Service Awards, Retirement Awards) are subject to the financial limits and authorisation requirements set out in those policies.
 - 2.2 Hospitality or entertainment events (e.g., awaydays, retirement functions, Christmas meals) must comply with the relevant policy limits and be authorised in advance.
 - 2.3 Any payments or gifts outside approved policies require authorisation by two members of the Executive Team, one of whom must be the Chief Executive or Director of Finance. Payments over £500 must also be approved by the Board Chair.
3. **Recording and Reporting**
 - 3.1 Individual payments or gifts over £500 will be recorded and reported annually to the Board.
 - 3.2 Managers are trusted to make sensible decisions on support provided in individual cases, within policy limits.
 - 3.3 All awards, gifts, and hospitality provided under approved policies are not recorded in the Register of Probity, Gifts, and Hospitality.
 - 3.4 For further details, refer to the relevant Coastline policies:

- Long Service Awards Policy
- Retirement Policy
- Excellence Awards Policy
- Expenses Policy

Appendix 4 – Gifts and hospitality received or offered to colleagues, Non-Executive Directors and Committee Members

1.0 Gifts

- 1.1 Isolated gifts of a trivial character or inexpensive (seasonal) gifts up to the value of £10 may be accepted and do not need to be declared. Examples of these would be calendars, diaries, pens, token small boxes of chocolates or other nominal value marketing gifts.
- 1.2 Any gift over £10 in value must be declared, even if not accepted.
- 1.3 No gift with a value in excess of £40 may be accepted without approval by the relevant Executive Director (or CEO in the case of an Executive Director; Board Chair in the case of the CEO). If approved the item/s may be held and raffled or used for charitable purposes. If the gift is perishable or otherwise not suitable for storage and raffling, it can be consumed by the relevant team at the discretion of the Assistant Director. Flowers may be kept by the individual. Alcohol will always be raffled. These gifts still need to be declared if their value is in excess of £10.
- 1.4 Should you have to decline a gift, you should be courteous but firm and advise that their kind offer would however be contrary to the Group's values and charitable status.
- 1.5 If a gift is offered to you and you refuse, you must still declare it, if over £10, so that a record can be kept of the offer having been made.

1.6 Examples

It is coming up to Christmas and a contractor or supplier with which you have been working with gives you a desk calendar and a pen. You estimate the value to be no more than £10 and accept the gifts. This is acceptable and does not need to be declared to the Group Company Secretary.

A contractor brings in a case of wine on the run-up to Christmas. You have worked with the contractor for some years and there are no cultural reasons why refusing the gift might offend. You accept the gift which must be declared for recording and passed to the Group Company Secretary. The items will be raffled internally or used for other charitable purposes.

2.0 Hospitality offered by Third Parties

- 2.1 You should never accept hospitality which could be interpreted as a way of exerting an improper influence over the way you carry out your duties. The timing of hospitality in relation to procurement or purchasing decisions which the Group may be taking is especially sensitive. Above all, you must never solicit hospitality. As a general rule, you should not accept hospitality which the Group would not reciprocate in similar circumstances.
- 2.2 When you have to decline hospitality, you should be courteous but firm and explain that it is not in keeping with Group's values and the need to comply with appropriate legislation.
- 2.3 You may accept modest working meals and light refreshments, not exceeding £40 in value which you must declare, in advance of the event if possible.

- 2.4 Where an offer of hospitality in excess of £40 is made to an employee, authority must be sought in advance from the relevant Executive Director (or CEO in the case of an Executive Director; Board Chair in the case of the CEO).
- 2.5 Other hospitality may be accepted, for instance where:
- There is a genuine need to impart or share information, or represent the Group;
 - Where the Group should be seen to be represented; or
 - The hospitality concerns attendance at a relevant event, conference or course where it is clear the hospitality is corporate rather than personal.
- 2.6 Attendance at sporting and other events, shows, concerts etc may also be accepted, subject to 2.5 above.
- 2.7 If you decline hospitality you still need to make a declaration, including an approximate value.

Examples

A consultant invites you to a seminar at a country house hotel. The seminar itself is only on Saturday morning but you are offered full hospitality on an all-inclusive basis for Friday and Saturday nights. You accept. This would almost certainly be seen as lavish hospitality because it is out of all proportion to the work element. On balance, the hospitality should be refused. At the very least, you should consult the Group Company Secretary before accepting such an invitation and ensure that it is declared in advance if approved by the relevant Executive Director.

A contractor offers you tickets to a local sporting event followed by light refreshments. You estimate the value to be around £25. Due to the low value it is acceptable and would need to be declared in advance.

A contractor offers you tickets to a sporting or other event followed by dinner. The total cost is expected to be around £80. This hospitality is personal and is only acceptable with approval in advance from the relevant Executive Director or the CEO setting out the events relevance to the Group's business. If approved and the member of staff decides to stay overnight the cost must be met by the individual and must not be reclaimed through the Group's Expenses Policy. If the contractor offered to pay for overnight accommodation this would be seen as lavish hospitality and would not be approved.

You are invited to attend and speak at a two-day seminar about an issue relevant to the Group by one of its contractors, followed by dinner and accommodation at an upmarket hotel. You estimate the value of the package to be around £300. You accept. This would be corporate and is acceptable but would require a declaration to be made in advance and consent to be sought from the relevant Executive Director or the CEO.

3.0 Hospitality Offered to Third Parties

- 3.1 All gifts or hospitality given or offered to other organisations or individuals must be declared and recorded in the Register of Probity, Gifts and Hospitality. Where Coastline is in any form of tendering or contractual negotiations, or is in dispute with an organisation, offering hospitality must be avoided.
- 3.2 Reasonable entertainment of customers and suppliers may be authorised in advance by the relevant Executive Director.

- 3.3 Any hospitality offered must be likely to help Coastline further its charitable objectives, will normally be instigated by senior managers (SLT) or Heads of Service, and must be pre-authorised by a member of the Executive Team. Hospitality may only be given to a maximum value of £40 per person.
- 3.4 It may, on occasion, be commercially prudent to provide hospitality over and above the £40 maximum limit. This will only be done with the prior authorisation of the relevant Executive Director or the CEO.

4.0 Internal Hospitality

- 4.1 Also permitted are Coastline events providing hospitality or entertainment specifically for colleagues, Non-Executive Directors, Committee Members, Involved Customers or other customer-centric events. For such events there will be a £50 per person per event limit with an overall limit of £250 per person per year, which would include retirement functions and Christmas meals.
- 4.2 Within these general guidelines managers are trusted to make sensible decisions on what support to provide in individual cases.

5.0 How to Make a Declaration

Email the Group Company Secretary at cosec@coastlinehousing.co.uk with the following details:

- Who offered the gift / hospitality (e.g. individual name, company) and the reason for it
- Value of gift/hospitality (if over the thresholds specified above)
- Date gift was given / hospitality was accepted
- Confirmation approval had been sought and received from the relevant Executive Director (where applicable) before accepting the gift / hospitality.

6.0 Escalation of Approval for Higher-Risk Gifts and Hospitality

Where a gift or hospitality poses a potential risk—such as reputational, financial, or compliance concerns—or where its nature, timing, or value could reasonably be perceived as creating a conflict of interest or undue influence, additional approval from a second executive should be sought. The decision to escalate should be made in consultation with the relevant Executive Director and the Group Company Secretary, who will advise and record the outcome.

7.0 Summary table of gifts and hospitality thresholds and approval requirements

Scenario	Requirement
Gifts up to £10	No approval or recording required
Gifts over £10 to £40	No approval required: Declaration required
Gifts over £40	Approval by one Exec Director (or CEO/Chair for CEO)
Hospitality up to £40	No approval required; Declaration required
Hospitality over £40	Approval by one Exec Director (or CEO/Chair for CEO)
Hospitality given over £40	Approval by one Exec Director (or CEO/Chair for CEO)

Appendix 5 - Declarations of Interest Form – Non-Executive Director/Executive Director/Independent Committee Member/Customer Member

I,, as a Non-Executive Director/Executive Director/Independent Committee Member/Customer Member* [*delete as appropriate] of Coastline Housing Ltd and its subsidiaries, have set out below my interests in accordance with the organisation's Code of Conduct, including Probity Standard:

Category	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family, connected persons or some other close personal connection	Start date (where applicable)	End date (where applicable)
Current employment and any previous employment in which you continue to have a financial interest.			
Appointments (voluntary or otherwise) e.g. trusteeships, directorships, local authority membership, JP etc.			
Membership of any professional bodies, special interest groups or political parties.			
Investments in unlisted companies, partnerships and other forms of business, major shareholdings, and beneficial interests.			
Are you a customer of Coastline or a family member of a customer of Coastline? <i>Note: Include address(es) of Coastline property where known.</i>			
Any contractual relationship with the charity or its			

Category	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family, connected persons or some other close personal connection	Start date (where applicable)	End date (where applicable)
subsidiaries.			
Any other conflicts that are not covered by the above (please include if you have a close connection to a Coastline employee e.g. a family member).			

I confirm that:

1. The information provided above is accurate and complete to the best of my knowledge.
2. I understand my duty to act only in the best interests of the organisation, and to comply with the Code of Conduct, Articles of Association and, for statutory directors, the Companies Act.
3. I will update this declaration promptly if circumstances change and will review it annually.
4. I understand that the organisation will record these interests in its Register of Interests and may publish a summary for transparency purposes (where appropriate under UK GDPR).
5. I understand that the information provided will be held in accordance with Coastline's privacy policy and data retention periods:

Signed:	
Name:	
Date:	