



Blackpool Coastal
Housing

Code of Conduct and Competence Policy

1st October 2026

INSPIRING PEOPLE TO BUILD **BETTER COMMUNITIES**

Document Information

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Scope of Document	BCH Code of Conduct.	
Objective	<p>Blackpool Coastal Housing will aim to give the highest possible standard of service to the public at all times, in a fair, respectful and non-discriminatory way.</p> <p>This code sets out the conduct and behaviours expected by all staff, BCH representative and those working on behalf of BCH, along with demonstrating BCH's compliance with the Competence and Conduct requirements set out by the Regulator of Social Housing.</p> <p>This code equally applies to BCH employees' dealings with fellow colleagues, relevant professionals and external customers to ensure our services are delivered professionally, with integrity, impartiality, respect and transparency.</p>	
Who needs to know?	All BCH staff, including casual workers and also agency workers engaged on a temporary basis.	
Documentation	<p>Learning and Development Policy</p> <p>Recruitment and Selection Handbook</p> <p>Equality in Employment Policy</p> <p>Disciplinary Procedure</p> <p>Social Media Policy</p> <p>Data Protection and Confidentiality Policy</p> <p>ICT Security, Usage & Monitoring Policy</p> <p>Professional Boundaries Policy</p> <p>IPA Policy</p> <p>1-1/Supervision Policy</p> <p>Managing Poor Performance Policy</p>	
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01/10/2026	1.7	All	Full Review and update to meet Competence and Conduct Standard from 1/10/2026	Kirsten Kennedy
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Amendment Notes

- Documents at draft status are to use letter designations to denote issue status: a, b, c etc.
- Documents at full issue status are to use number designations to denote issue status after full revision: 1.0, 2.0, 3.0, etc.
- For an amendment to a full issue document you are to use number designation to denote issue status: 1.1, 1.2, 2.1, etc.
- On full issue the draft amendment record should be deleted from the above table.
- Notification of the amendment must be sent to the person maintaining the Central Register.

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1.0 Introduction

- 1.1 Blackpool Coastal Housing (BCH) believes that its activities demand the highest standards of confidence from the public and that this confidence will derive from the way in which BCH and its employees conduct themselves in undertaking its business.
- 1.2 Employees are expected to give the highest possible standard of service to our customers, and where it is part of their duties, to provide appropriate advice to fellow employees with integrity, impartiality, respect and transparency.
- 1.3 Employees should always remember their responsibilities to the community they serve whilst they are engaged on all Blackpool Coastal Housing business, ensuring courteous, efficient and impartial service delivery to all groups and individuals, treating all with fairness, dignity and respect as defined by BCH policy.
- 1.4 The Code is integral to the ethos of BCH's Vision and Values, which are supported by our Service Standards and Behaviours. BCH's internal and external customers can expect that we deliver our Vision through these behaviours from all BCH employees and representatives, or those working on behalf of BCH. The expected behaviours (Code of Conduct) for all employees to display always can be found at Appendix A.
- 1.5 It is, therefore, important for BCH to provide guidance on standards of conduct, which is available to, and understood by staff at all levels. Where examples are listed in the Code as guidance, they are not intended to be exhaustive.
- 1.6 The policy and Code of Conduct aim to ensure that all relevant staff have the required skills, knowledge, qualifications and experience, and display the right behaviours, to deliver high quality services for our residents. It also sets out how we will ensure that we comply with the Competence and Code of Conduct of the Consumer Standards, as set out by the Regulator of Social Housing (see Section 2).
- 1.7 The Code is additional to appropriate statutes, sections of the National Scheme of Conditions of Service, the Financial Regulations and also Blackpool Council's Constitution, in particular the protocols on Member/Officer Relations.
- 1.8 The Code applies to all employees of BCH and is incorporated into and forms part of the contractual relationship between BCH and its employees. As such, it may be used in any proceedings under the BCH disciplinary and grievance procedures.
- 1.9 The Code of Conduct cannot cover all areas that are likely to arise in practice, but the principles of the Code will apply in order to ensure the integrity of BCH is always maintained.

2.0 Managing and Maintaining the Competence and Conduct Code Standard

- 2.1 This policy and Code ensure BCH's compliance with the Regulator of Social Housing's *Competence and Conduct Standard*, as laid out in the Direction on the Regulatory Standards (Competence and Conduct) 2025.

These Regulatory Standards cover both Conduct and Competence, with competence requirements comprising mandatory qualifications for senior staff, as set out in the *Competence and Conduct Standard: Policy Statement*: [Competence and Conduct Standard: Policy statement](#)

- 2.2 BCH will ensure Competency Standard compliance through all employees being equipped with the required skills, knowledge, qualifications and experience, whilst displaying the right behaviours, to deliver high-quality services for our residents.

Details of how BCH complies with the qualification element of the Competence and Conduct Code can be found in BCH's Learning & Development Policy.

- 2.3 In terms of the Code of Conduct, beginning with our recruitment processes, BCH will ensure that all appointed staff have the appropriate skills, knowledge, qualifications and experience to carry out their role effectively, as stated in the Job Description for the role, whilst also exhibiting the positive behaviours needed to ensure the services they provide are of a good quality.
- 2.4 Compliance with the Competence and Conduct Standard will be monitored and managed through a regular cycle of reviews, comprising an initial probation period and beyond to regular supervision and appraisal cycles for ongoing performance management.
- 2.5 BCH will also ensure that all "Relevant Persons" will hold, or will work towards, within the relevant timescales, a housing management qualification, or training which meets the Regulator's requirements and that BCH will maintain records of such training and the qualifications held.
- 2.6 Should any employee's performance fall short of the expected level required, including "Relevant Persons" it will be addressed through the Managing Poor Performance Policy or Disciplinary Policy Procedure.
- 2.7 BCH's Code of Conduct, which details the standards and behaviours expected from BCH employees can be found in Appendix A. The Code of Conduct was reviewed and updated following a consultation exercise with tenants who provided, as part of a survey, their insight, customer voice and influence into what they felt the most important qualities in a housing professional were.

3.0 General Standards - Employee Conduct

- 3.1 BCH is committed to the prevention of fraud and corruption. Employees must ensure that they use public funds entrusted to them in a responsible and lawful manner in accordance with the Bribery Act 2010. All employees should act honestly and with integrity and to safeguard the public resources for which they are responsible. Where appropriate they will also be bound by BCH's Anti-Fraud and Corruption Strategy.
- 3.2 Employees should deal with all matters with a level of competence appropriate to the role and in line with any professional Codes of Conduct which apply to them.
- 3.3 Employees should raise any serious and genuine concerns about any wrongdoing in BCH's work or decisions by using BCH's Whistleblowing Policy. They can do this without fear of recrimination, harassment or victimisation.
- 3.4 BCH policies relating to equality issues in employment and service delivery must be complied with, in addition to the requirements of the law. All members of the local community, customers and other employees have a right to be treated with fairness and equity, in accordance with BCH's Equality Policy and the Equality Act 2010.

- 3.5 Standards of dress, personal appearance and hygiene, as well as those required in the interests of health and safety, can be matters affecting public confidence. Employees should, therefore, ensure they dress and present themselves in a professional way relevant to the work situation, to maintain customer confidence and demonstrate an awareness and compliance with the expected standards for their role.
- 3.6 In the interests of the public and colleagues, employees must adhere to BCH's Health and Safety arrangements. Employees must not act either wilfully or unintentionally in a manner liable to place the public, their colleagues, or themselves at risk, and must adhere to the duty of care prescribed in BCH's Health and Safety arrangements. This is particularly the case where an employee has direct responsibility for the welfare of service users.
- 3.7 It is important that all employees working with children, young people and vulnerable adults understand that the nature of their work, places them in a position of trust. Such employees should be familiar with government guidance, local procedures and protocols for safeguarding the welfare of children, young people and vulnerable adults. Employees have a duty to report any child protection or welfare concerns to a designated member of staff in the organisation.
- 3.8 It is the responsibility of every employee to immediately report:
- any criminal offence, caution, conviction or police involvement concerning their conduct that occurs during employment, whether inside or outside of working hours.
 - if they are barred from any professional occupation during the course of their employment.
- 3.9 In addition, any employee working in an activity where a DBS of any level is required must also report any criminal offence, caution, conviction or police involvement concerning the conduct of their partner (regardless of whether they are living in the same household) or a family member living in the same household.
- 3.10 In respect of 3.9 above, careful consideration will be given to the information shared as to the relevance to the genuine connection to an employee's specific role. This may result in action being taken, which may include action of a disciplinary nature.

4.0 Disclosure of information

- 4.1 Employees must respect the confidentiality of any information they are given. Managers and supervisors should make themselves and their staff aware, where information they come into contact within the course of their employment is confidential. Employees should not prevent another person from gaining access to information to which that person is entitled by law.
- 4.2 All information contained in personal data relating to members of the public and employees must be obtained, held and processed fairly and lawfully in accordance with the General Data Protection Act 1998 and the Data Protection Act 2018 and must not be used or disclosed in any manner incompatible with that legislation. In addition, employees in the course of their employment with BCH will have access to and be entrusted with information about the business of BCH and/or its customers and clients, which is confidential or commercially sensitive and must abide by any restrictions set down.
- 4.3 To protect the confidentiality of this information and without prejudice to other obligations an employee may have in handling information, employees must:
- Not disclose to any person or make use of any such confidential information unless authorised to do so

- Not make any copies, abstracts or summaries of the whole or part of any document, computer record or other records belonging to BCH, except when required to do so in the course of their employment.
- 4.4 Employees must not use any information obtained in the course of their employment for personal gain or benefit, nor should they pass it on to others who might use it in such a way. This does not apply to staff benefits schemes.
- 4.5 Upon the termination of their employment with BCH for whatever reason or otherwise at BCH's request, an employee must immediately return all property belonging to BCH or third party held in connection with their employment which may be in their possession or control.
- 4.6 Employees must not contact the media or disclose information relating to the work of BCH to the media. Any requests from the media to BCH should be directed to the Chief Operating Officer and/or Directors, who are designated as official spokespersons for BCH. This includes employees having due regard to the BCH policy on social media.
- 4.7 Employees are required to accept, in full, the rules contained in the relevant Information Governance policies. Any breach of these policies will be considered a serious breach of the employee's contract terms of employment, and BCH may instigate disciplinary proceedings.

5.0 Political neutrality

- 5.1 Employees holding politically restricted posts are disqualified, under the Local Government and Housing Act 1989, from membership of any local authority, other than a parish or community council, from being an MP or MEP and are subject to prescribed restrictions on their political activity. All employees holding a politically restricted post will have been notified, in writing.
- 5.2 Politically restricted posts fall into two broad categories: specified posts and sensitive posts. Postholders in specified posts are politically restricted without the right of appeal.

(i) Specified Posts

- Statutory and Non-Statutory Chief Officers
- Deputy Chief Officers reporting to a Chief Officer
- Officers exercising delegated powers i.e.: employees whose posts are for the time being specified by the Authority in a list maintained in accordance with s100G(2) of the Local Government Act 1972
- Assistants to political groups.

(ii) Sensitive Posts

These are posts where the primary role is to give advice on a regular basis to:

- the Authority itself
- any committee or sub-committee of the Authority
- any joint committee on which the Authority is represented
- the Executive of the Authority or any committee of the Executive
- any member of that Executive.

Sensitive posts are those of Chief Operating Officer and Director level, who would be expected to speak on behalf of BCH, as necessary, to the wider media.

- 5.3 Employees, whether or not in a politically restricted post, must not allow their own personal or political opinions to interfere with their work. This shall not prevent employees expressing a professional view in accordance with their duties.
- 5.4 Employees may be required to advise political groups. They must do so in ways which do not compromise their political neutrality and in line with Blackpool Council's Protocol on Member/Officer Relations.
- 5.5 Mutual respect between employees and councillors is essential to good working relationships. Close personal familiarity between employees and individual councillors can damage the relationship and prove embarrassing to other employees and councillors and should therefore be avoided when dealing with BCH and/or Council business.

6.0 Appointment and Other Employment Matters

- 6.1 Employees involved in appointment and promotions should ensure that any decisions are made in accordance with BCH's Recruitment and Selection Handbook, Recruitment Policy and Equal Opportunities Policies and Procedures on the basis of merit.
- 6.2 In order to avoid any possible accusation of bias, employees should not be involved in an appointment where they are related to an applicant or have a close personal relationship outside work with them or seek to influence an appointment or promotion for any purpose.
- 6.3 Similarly, employees should not be involved in decisions relating to discipline, promotion or pay for an employee who is a relative, partner or close friend.
- 6.4 Employees must not approach elected members on matters relating to reorganisations, terms and conditions of employment or other employment matters that affect them individually, except through procedures laid down in Human Resources policies and procedures.

7.0 Outside Commitments

- 7.1 All employees should not engage in any other business or take outside employment which conflicts with BCH's interests, for example, working with or for someone who does business or seeks to do business with BCH.
- 7.2 Officers on administrative, professional or technical grades above Scale 6 (SCP 19 and above) must not engage in any other business, such as any paid or unpaid employment or running a business, or take up any other additional appointment, without first receiving the express consent, in writing, from their relevant Director, with a central record being kept by HR. The Chief Operating Officer (responsible for HR) should be notified of any approvals granted.

Consent is not, however, required for:

- (i) work in connection with religious bodies
- (ii) work in connection with the social and charitable life of the town
- (iii) work in connection with Friendly Societies, trade unions, staff organisations etc
- (iv) contributions to professional and trade periodicals or societies and other literary and recreational and artistic pursuits

(v) part-time teaching in technical colleges, evening schools, and tutorial work outside normal working hours.

- 7.3 Employees may not undertake outside work for payment by a member of the public on any matter connected with their official duties.
- 7.4 Employees may accept appointments as Presiding Officers/Poll Clerks at Elections or as Census Enumerators, with the necessary days of absence to count against their leave entitlement.
- 7.5 BCH will not attempt to preclude any of its employees from engaging in any other businesses or from undertaking additional employment, but any such employment must not, conflict with or be detrimental to BCH's interests, or in any way weaken public confidence in the conduct of BCH's business.
- 7.6 Employees should not use BCH's premises, facilities and other resources in connection with their outside commitments.

8.0 Personal Interests

- 8.1 Employees must declare in writing, via the appropriate form to their relevant Director, if they have any personal interests or involvement which might conflict with their employment or with the interests of BCH.

For example:

- membership of another housing provider or contractor with which BCH deals regularly.
 - membership of any voluntary organisation, club or society that regularly seeks assistance from BCH or to which BCH appoints representatives.
 - membership of any organisation (other than a political party or a trade union) which seeks to influence BCH's policies and decisions.
 - any land in which they have an interest which is to be, or likely to be, the subject of a BCH decision.
- 8.2 To ensure BCH holds up to date information regarding personal and financial interests for all BCH employees, a Register of Personal Interests Form must be completed by all employees on an annual basis to ensure the most up to date information is held confidentially by HR. This is to ensure compliance with financial regulation, governance and audit requirements.
- 8.3 An employee's off-duty hours are their personal concern, but these should not put an employee in a position where BCH duty and private interest's conflict, or where public confidence in the conduct of Blackpool Coastal Housing's business would be weakened.

9.0 Equality Issues (including use of social media)

- 9.1 All Blackpool Coastal Housing employees should ensure that policies relating to equality issues as agreed by Blackpool Coastal Housing are complied with in addition to the requirements of the law. All members of the local community, customers and other employees have a right to be treated with fairness, respect and equity at all times.
- 9.2 Employees should be aware that this extends to their use of social media. Any social media activity by an employee should be respectful and non-discriminatory and meet the expected

standards detailed in the Social Media Policy to avoid potential disciplinary action for failure to meet the required standards.

- 9.3 BCH respects an employee's right to a private life. However, BCH must also ensure that its reputation and confidentiality are always protected, by ensuring that staff are protecting themselves when using the internet and recognising that many employees make use of social media in a personal capacity.

When not acting on behalf of BCH, employees must remember their responsibilities to the community they serve and be aware that they can damage the organisation if they are recognised as being one of our employees, or their use is in any way linked to BCH, its employees, customers or partner agencies.

- 9.4 All employees are bound by the Equality in Employment Policy and Social Media Policy.

The Social Media Policy sets out our organisation's expectations on the workforce's use of social media and reminds staff of the standards of behaviour expected of them when they are posting on social media, as well as the consequences of falling below those standards. All employees should familiarise themselves with the standards of conduct, including respecting others, to avoid any potential disciplinary action.

10.0 Involvement in Contracts

- 10.1 Orders and contracts must be awarded on merit by fair competition against other tenders, in accordance with Blackpool Council's Financial Regulations and Contract Procedure Rules, which BCH adopt. No special favour should be shown to businesses run, for example, by friends, partners or relatives in the tendering process and the process should fully comply with BCH's equality framework.
- 10.2 Employees who have access to confidential information on tenders or costs for contractors must not disclose that information to any unauthorised party or organisation.
- 10.3 Employees who engage or supervise contractors, or potential contractors must declare any official relationship, in writing, via the Register of Interest form to their relevant Director, as soon as possible. Do not wait until the annual Register of Interest refresher exercise to disclose any official relationship, as disclosure is required immediately this is known.

Official relationships include any previous or current relationships of a business or personal capacity, with current contractors or potential new contractors.

- 10.4 Employees in their official relationships with contractors and potential contractors must not conduct themselves in such a manner to imply that they are in a position of giving special favour. Nor shall they canvass directly or indirectly or infer that they seek a gift, loan, fee, reward or advantage, or any offer of such. No officer concerned in any way with official contracts or purchasing should ever disclose their private address to a contractor.
- 10.5 No officer may purchase goods from or use the service of a contractor on preferential terms for private purposes if these terms are given either directly or indirectly because of the contractual or other official business relationship, either potential or actual between the contractor and the department.
- 10.6 Whilst the above apply to all employees whose duties bring them into contact with contractors, they are of particular importance to staff in contracts and purchasing sections who are in close touch with commercial firms seeking the opportunity to tender for BCH's requirements. It is important that the actions of such employees should be manifestly above suspicion of bias in favour of a particular firm and every care must be taken not to disclose 'in confidence' information, e.g. tender prices.

11.0 Gifts and Hospitality

- 11.1 Employees need to be aware that it is a serious criminal offence for them to receive or give any gift, loan, fee, reward or advantage for doing or not doing anything or showing favour or disfavour to any person in their official capacity. Employees should advise their director at the earliest opportunity of any such approach which is made to them. Any allegation of wrongdoing will be investigated under BCH's Disciplinary Procedure.
- 11.2 Employees should only accept offers of hospitality if there is a genuine need to represent BCH. Offers to attend purely social or sporting functions must not be accepted unless there is a reasonable expectation for BCH to be represented. The acceptance of hospitality should be properly authorised in advance, formally accepted and registered, by informing the employee's Director. Hospitality should be registered within 28 days of its acceptance.
- 11.3 When receiving authorised hospitality employees should be particularly sensitive as to its timing in relation to decisions which BCH may be taking affecting those providing the hospitality. Employees should not accept hospitality, entertainment or working lunches from contractors and outside suppliers or people or organisations subject to decisions by BCH. Where visits to suppliers are required, employees should ensure that the BCH meets the employees' costs of such visits rather than accept hospitality from suppliers.
- 11.4 Acceptance by employees of hospitality through attendance at relevant conferences and courses is acceptable where it is clear the hospitality is corporate rather than personal and where BCH is satisfied that any purchasing decision is not compromised. In those circumstances, employees are not required to register the hospitality.
- 11.5 Employees should not accept personal gifts from contractors and outside suppliers, people or organisations subject to decisions by BCH, with the exception of items of token value such as pens, and diaries.
- 11.6 Each employee is personally responsible for decisions regarding the acceptance of hospitality or gift items. If there is any doubt such items should be refused and employees should seek advice from a more senior member of management or the Director.
- 11.7 Employees must register any gift other than of token value, which cannot be politely refused, by completing the appropriate form and submitting this to their relevant Director within 28 days of receipt. Guidance written on this subject matter is intended so that employees can make their own decisions about what should be declared. However, as a general rule any gift that has an estimated value of over £25 must be declared. Directors will ensure that a list of hospitality and/or gifts of more than £25 is kept within their Directorates.
- 11.8 Where an outside organisation wishes to sponsor or is seeking to sponsor a BCH activity, whether by invitation, tender, negotiation or voluntarily, the requirements of this Code concerning the acceptance of gifts or hospitality apply. Particular care must be taken when contractors or potential contractors are potential sponsors to avoid the appearance that providing sponsorship is linked to the awarding of any contract.

12.0 Compliance with the Code

- 12.1 The Code of Conduct and Competence policy is part of every employee's Contract of Employment. An employee's failure to comply with the Code may result in disciplinary action being taken under the Disciplinary Policy and Procedure. BCH reserves the right to take legal action against employees where breaches of the Code warrant such action.

- 12.2 The Chief Operating Officer and HR Manager are jointly responsible for the implementation of the Employee Code of Conduct and for ensuring it is regularly reviewed.

13.0 Monitoring and Review

- 13.1 This policy will be reviewed annually. The review date will be brought forward should there be any significant organisational, operational or legislative changes.
- 13.2 As part of the annual review, the BCH Board and/or Audit Committee will receive annual performance reporting for assurances that BCH maintains compliance with the regulatory requirements. This also includes reporting and monitoring of complaints regarding staff conduct, which are reported to the Board on a quarterly basis as part of our complaint handling process.

14.0 Accessibility

- 14.1 This Code of Conduct and Competency Policy will be available to both employees and also BCH tenants.

Should a BCH tenant require a copy of the policy, it will be made available, if required:

- In a readable typeface and print size – our website includes details of how to change settings for those with visual impairment
 - Translated where appropriate – as the BCH website includes Google translate
 - Upon request in formats suitable for customers with specific communication needs, e.g. picture format or electronic for use with screen readers.
- 14.2 If you require any assistance to understand or access this document, you can contact BCH at: enquiries@bch.co.uk

Appendix A – Our Expected Behaviours

To achieve our Vision and Values and attain our Service Standards, BCH's internal and external customers can expect that we deliver these through the following expected behaviours from all BCH employees and representatives or those working on behalf of BCH:

Customers can expect that we will operate professionally adhering to the following core themes:

Respect and Dignity

- Be respectful, polite and friendly in all our communications, both internally and externally, avoiding the use of jargon
- Take the time to listen to customers and try our best to understand their needs or concerns
- Show empathy and understanding
- Respect our customers' right to confidentiality
- Have a positive, can-do attitude and be progressive in our thinking

Honesty and Transparency

- Be clear about the level of service our customers can expect from us
- Be open and honest
- Be transparent about what we can deliver and how long it will take
- Respond to customer enquiries in a timely manner, taking time to explain our decisions and keeping them informed of what action we are taking

Fairness and Equality

- Aim to prevent discrimination and promote equal opportunities in all our dealings with customers and treat everyone fairly
- Give our customers choice in how they access our services where possible
- Deliver services in a way that offers good value for money
- Be considerate of the workloads of our colleagues when making requests for their help and time

Knowledge and Accountability

- Take responsibility for our actions and act with integrity
- Be good at what we do. If we don't get it right first time, we will apologise and try to make it right
- Listen to the views of our customers to help make improvements and drive services forward
- Answer customer enquiries accurately and as fully as we can, only referring them to another person if absolutely necessary
- Try our best to find out which organisation can help, if we can't
- Ensure employees who are identified as "relevant Individuals" within the Competence & Conduct Code are appropriately qualified and continue to maintain and demonstrate these skills and attributes.
- That employee performance is reviewed and managed in order to develop and maintain skills and competence, and to also identify and take action where performance falls short of expectations.