



Code of Conduct and Behaviours

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**Please note this document is available in Welsh and other formats upon request.
Please contact the communications and media team.**

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1.0 Introduction

At Trivallis, we believe that how we behave matters as much as what we deliver.

This Code of Conduct sets out the standards we follow at Trivallis. It reflects our values of Kind, Progressive, Trustworthy, and Inclusive, and helps us create a safe, respectful, and transparent environment for everyone. Our Code guides how we:

- treat our tenants, colleagues and communities
- make decisions
- take responsibility
- speak up and support each other

If you have any doubts about how this Code applies to your situation, please speak to:

- Board or Committee members and involved tenants and residents – the Governance Team or the Community involvement Team
- Employees - your line manager or the People Services team

We expect everyone to take personal responsibility for their behaviour and its impact. If something doesn't feel right, we speak up.

2.0 Principles and Values

This Code of Conduct applies to everyone involved with us: Board members, committee members, employees, volunteers, and tenants. Where specific provisions apply to a particular group, this is clearly stated. Not complying with this Code may result in an employment or governance investigation, depending on your role.

The Key principles of the Trivallis Code of Conduct sit alongside our Values and Behaviours framework:

2.1 Kind

We treat everyone with dignity, respect and empathy. We:

- listen and seek to understand different perspectives
- communicate openly, honestly and respectfully
- consider the impact of our actions on others
- support colleagues and tenants and recognise their contributions
- go the extra mile where we can

2.2 Trustworthy

We act with honesty, integrity and accountability. We:

- are open and transparent in our actions and decisions
- take responsibility for our work and follow through on commitments
- build strong, respectful relationships
- act in the best interests of tenants and the organisation
- speak up if something doesn't feel right

2.3 Progressive

We are open to change and committed to continuous improvement. We:

- learn from experience and seek to improve
- embrace new ideas, technologies and ways of working
- listen to feedback from tenants and colleagues
- support learning and development
- look for ways to improve services and outcomes

2.4 Inclusive

We create an environment where everyone feels valued and heard. We:

- treat people fairly and with respect
- value diversity and different perspectives
- challenge discrimination and inappropriate behaviour
- involve colleagues, tenants and communities in decisions
- ensure everyone has a voice

3.0 In Practice

3.1 Acting with Integrity

We comply with the law, regulatory requirements and Trivallis policies. This means we:

- Act ethically and professionally at all times
- Do not engage in criminal activity. Any criminal charge or conviction which is relevant to our role OR which may bring Trivallis into disrepute, will be disclosed promptly to People Services
- Do not act in a way that could bring Trivallis into disrepute - including through social media, personal blogs or public comments, whether or not Trivallis is named
- Report concerns or wrongdoing where it is safe to do so (see Section 3.8)
- Respect collective decisions: once a proper decision has been made by the Board, a Committee or the Executive Leadership Team, we support it even where we personally disagreed
- Ensure partners and contractors meet our standards

3.2 Conflicts of Interest

- We always put Trivallis' mission and residents first.
- We avoid situations where our personal interests, or the interests of people connected to us, could influence or appear to influence our decisions or actions.
- We openly declare any actual, potential, or perceived conflicts of interest in line with the Declarations of Interest policy.
- We step back from any decision, appointment or procurement process where a conflict exists or could reasonably be perceived to exist.
- We never use our role, information, or influence for personal gain or to benefit others improperly.
- We consult the Governance Team whenever clarification or support is required regarding a conflict of interest.

3.3 Pay Decisions

- Pay decisions will be fair, clear, and based on need - not favouritism or connections.
- We will aim to be transparent in our pay decisions and uphold the law on equal pay principles.
- No one will get preferential treatment, such as housing, jobs or other perks, simply because of their connections.

3.4 Gifts, Bribes and Hospitality

- We will never accept, or offer, bribes.
- We hold all consultants, contractors, and suppliers to the same standard and ensure that all partners have their own policies on bribery.
- We do not seek or accept gifts, hospitality or other benefits that could compromise our judgement or integrity, or place us under any obligation.
- If a gift or hospitality is offered, we decline it or seek prior approval. If accepted, it must be recorded in the Gifts and Hospitality Register. Small gifts and hospitality (defined in the Gifts and Hospitality Policy), as the only exceptions.
- We hold all consultants, contractors, and suppliers to the same standard and ensure that all partners have their own policies on bribery.

3.5 Respect at Work

We create a respectful, inclusive and psychologically safe environment where people feel able to speak up. This means we:

- Treat others with dignity and professionalism

- Where a concern is raised or observed, we take prompt action
- Do not harass, bully or attempt to intimidate any person
- Do not display or share material that others could reasonably find offensive
- Address inappropriate behaviour promptly and fairly
- Contribute positively and supportively in meetings and decision-making
- Do not attend work, meetings or events while representing Trivallis while intoxicated or under the influence of drugs

Board and committee members are expected to attend meetings regularly, come prepared and to act in line with our Values and Behaviours at all times.

3.6 Trivallis Resources

We all have a responsibility to use Trivallis resources, for example IT equipment, systems passes and other assets, appropriately, securely and for legitimate business purposes. We:

- Take care of what we're given, follow relevant policies, and report any loss, damage or misuse promptly
- Use resources efficiently, economically and only for Trivallis business
- Follow our policies, including those on acceptable use of email, internet and social media, and Trivallis data
- Report any loss, damage or misuse promptly
- Claim expenses only for expenditure properly and reasonably incurred in carrying out Trivallis business, ensuring all claims are accurate
- Follow procurement policies to ensure value for money and fairness in decision-making

3.7 Equal Opportunities

- We live our Equity, Diversity and Inclusion commitments and act in those principles in everything we do.
- This Code is part of making sure Trivallis is accessible, inclusive and anti-discriminatory at all times.

3.8 Politics

- As a social housing provider, Trivallis remains politically neutral.
- We do not promote or support any political party or campaign.
- When using social media or representing Trivallis in any way, we act in line with our Social Media Policy.

3.9 Confidentiality

We handle information carefully, legally and in line with Trivallis's policies. This means we:

- process all personal data in accordance with data protection legislation and Trivallis's policies, whether held on paper or electronically
- do not disclose confidential business information without authority - this duty continues after you have left Trivallis or relinquished your role
- do not represent the views of Trivallis, write to the press, or make public statements about Trivallis without prior authority - if approached by the media, pass the enquiry to the appropriate person
- do not prevent any person from accessing information they are entitled to by law

3.10 Health & Safety

Our conduct must not endanger the health, safety or security of ourselves or others. This means we:

- comply with Trivallis's health and safety policies and bring any risks to the attention of the appropriate person promptly
- wear protective clothing when provided and directed to do so
- follow Trivallis's policies on lone working and safeguarding
- comply with Trivallis's policies on smoking, e-cigarettes, alcohol, illegal drugs and other substances

3.11 Speaking Up

A healthy organisation depends on people feeling safe to raise concerns. We all have a responsibility to speak up when something doesn't feel right and Trivallis has now developed a reporting tool called Speak Up!

Our Speak up principles mean we:

- report any reasonable and honest suspicion of wrongdoing, dishonest or fraudulent activity, or material breach of this Code to the appropriate senior person within Trivallis
- report it if we believe we are being asked to act in a way that conflicts with this Code
- never victimise any person who raises a concern in good faith or who uses Trivallis's confidential reporting (whistleblowing) procedures
- Trivallis's policies on bribery, fraud, money laundering and confidential reporting give further guidance.

In the first instance, all concerns should be raised with your line manager. Where this isn't appropriate, escalate to any Head of Service or Director, or Executive Director.

Where the concern involves the Chief Executive or an Executive Director, this should be raised to the Head of Assurance who will arrange for the concern to be investigated by the Chair of the Board.

Concerns can be made through your manager, or using the [Speak Up!](#) Form.

4.0 Review

This policy will be reviewed every year by the Head of People Services and the Head of Governance, or earlier where appropriate.

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