



STAFF CODE OF CONDUCT

May 2017

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APPENDIX 1: Form of Acceptance

1.0 INTRODUCTION

Purpose of the Code

- 1.1 All staff members are important to Prospect Community Housing, as you have an essential part to play in ensuring that we continue to deliver high standards of service in every area of our activities, and that we maintain our integrity and reputation.
- 1.2 The purpose of this Code is to set out the overall standards of conduct expected of all staff, both collectively and individually, to ensure that together we:
- uphold and promote Prospect's vision, values and objectives;
 - meet our responsibilities;
 - act in accordance with our legal obligations;
 - continue to observe high ethical standards.

The Code does not attempt to describe the appropriate behaviour for every situation. Its aim is to alert you to areas of particular importance, especially with regard to conduct likely to bring Prospect into disrepute or undermine our integrity.

- 1.3 This Code is part of our overall arrangements for 'good governance'.

In all our Codes, policies, procedures and practices we will comply with the law and with all relevant regulations, guidance and 'good practice' advice issued by the UK or Scottish Governments, Scottish Housing Regulator, Office of the Scottish Charities Regulator and any other statutory/public body which impacts on our activities and the services we provide.

- 1.4 A key priority is to ensure that the way you carry out your duties gives tenants, other service users and stakeholders, funders, the various Regulators and all others involved in our activities the confidence that our affairs are being properly conducted.
- 1.5 This Code aims to help you know what is expected of you. We recognise however that this Code on its own is not enough and we will also provide training, support, assistance and advice as required, to provide and develop the skills, knowledge and experience necessary.

We aim to ensure that being a member of Prospect's staff is a worthwhile and rewarding experience.

The 'Nolan principles'

- 1.6 The core values underpinning this code are the 'Seven Principles of Public Life' identified by the Nolan Committee on Standards in Public Life. These principles are:

Selflessness: You should take decisions solely on the basis of Prospect's values, objectives and interests. You should not make decisions in order to gain financial or other material benefits for yourself, your family or friends.

Integrity: You should not place yourself under any financial or other obligation to outside individuals or organisations that might influence you in the performing of your duties.

Objectivity: You should ensure that in the delivery of services, awarding of contracts, selection of staff etc. you comply with our policies and procedures so that you remain impartial and make choices solely on merit.

Accountability: You must be accountable for your decisions and actions and submit yourself to whatever scrutiny is appropriate to your post, both internally and/or by external bodies, regulators etc.

Openness: You should be as open as possible about all the decisions and actions that you take. You should give reasons for your decisions, and restrict information only when clearly required by individual or commercial confidentiality, or other statutory regulations.

Honesty: You have a duty to declare any private interests relating to your duties, which might impact on your performance and/or result in personal financial gain. Where any actual or potential conflicts of interest arise you must take steps to resolve them in a way that is lawful and protects Prospect's reputation, values and aims.

Leadership: You should promote and support these principles through your actions and behaviour.

Application & review of the Code

- 1.7 This Code applies to the individual conduct of all staff, and to your corporate conduct as part of your staff team and of the organisation as a whole.

It applies to your conduct while on duty in or outwith the office, or when attending a conference, seminar or external meeting on Prospect's behalf, or when attending social events such as anniversaries or Christmas parties, whether within or outwith your normal office hours. It also applies to your personal behaviour generally, with regard to actions that may have a negative impact on Prospect's integrity or reputation.

- 1.7 The Management Committee is responsible for approving an appropriate Staff Code of Conduct.

The Director and Managers are responsible for implementing the Code, both through their personal behaviour, and by ensuring that their staff are fully aware of the Code's requirements and regularly monitoring compliance.

All staff are responsible for ensuring that they comply with this Code in carrying out their duties, and that they represent Prospect positively in all their official and personal contacts.

- 1.8 This Code has been finalised following consultation with staff, approved by the Management Committee and signed by existing staff. On appointment, each new staff member will sign to confirm their acceptance of the Code.

- 1.9 The Management Committee will review this Code at least every 3 years. Should it be amended in the future, following consultation as required, all staff will be asked to sign the revised Code.

2.0 VISION, VALUES and STRATEGIC OBJECTIVES

By complying with this Code staff will contribute to the upholding and promoting of our current Vision, Values and Strategic Objectives, which are:

2.1 Vision

Providing homes and building communities together.

2.2 Values

Our values underpin and drive all our activities. They reflect who we are and what we continually seek to achieve. Our values are:

- a) Pioneering
- b) Reliability
- c) Listening
- d) Fairness
- e) Partnership

2.3 Strategic Objectives

We have set the following strategic objectives, to be achieved by the end of March 2018:

1. **Independence** – thrive as an independent, community based organisation;
2. **Planned property improvements** – invest £4.4 million during the period of our 2015-2018 Business Plan, including work to fully meet the standards set out in the Energy Efficiency Standard for Social Housing (EESH);
3. **New housing provision** – to build new affordable homes to meet housing need, providing the contribute to the financial health of Prospect;
4. **Affordable rents** – achieve a maximum of inflation (RPI) only rent increases from April 2016;
5. **Customer service** – improve tenant satisfaction (to be measured by the survey results from the next tenant survey);
6. **Community Projects** – develop new community projects, and ensure current projects are reshaped appropriately, in partnership with other agencies that meet local priorities.

2.4 Business Plan

Our work and reputation rely on everyone involved being familiar with and acting in accordance with our vision, values and objectives.

These are translated into annual objectives and priorities in our Business Plan, including detailed departmental action plans. All staff should ensure they have read the current Business Plan.

2.5 **Personal objectives**

You should ensure that your current personal performance objectives contribute to achieving Prospect's overall objectives as detailed in the current Business Plan, and that they are in line with our aim, objectives and values.

3.0 PERSONAL CONDUCT & BEHAVIOUR

Introduction

- 3.1 As a Prospect member of staff you are expected to carry out your duties in accordance with all our current policies and procedures, and with high standards of efficiency, reliability, courtesy, respect, punctuality and personal conduct in your working relationships with Committee Members, colleagues, tenants, applicants, other service users and all others you come into contact with through your work.

Integrity & honesty

- 3.2 You are expected to:
- demonstrate a high standard of integrity, openness and honesty in carrying out your duties;
 - ensure that you do not place yourself under any obligation to anyone outside Prospect, for example through accepting a gift, that could or would result in your decisions being influenced to favour a particular company or individual;
 - ensure you do not use your position for any personal gain of any kind, either for yourself directly or for your family, friends or associates.

Equality & diversity

- 3.3 We are committed to equality of opportunity in every area of our work, including membership of Prospect, membership of the Management Committee, and all our activities involving tenants, other service users, staff and other members of the public.

Our commitment is detailed in our [Equalities & Diversity](#) policy.

- 3.4 You are expected to uphold and promote our commitment to equality and diversity in your own conduct and in your relationships with others, as you carry out your duties.

Relationships with Committee Members and colleagues

- 3.5 If your work brings you into contact with Committee Members, mutual respect between you and them is essential.

You should also treat your work colleagues with respect, fairness and consideration, and expect to be treated in the same way by them.

- 3.6 We are committed to ensuring that everyone is able to work and participate in Prospect's activities without fear of harassment, bullying or intimidation. You are responsible for ensuring that your own behaviour, whether intentional or unintentional, does not constitute harassment etc. If you observe, or if you experience personally harassment, bullying or intimidation at work you should report your concerns promptly as detailed in our [Dignity at Work](#) policy.

- 3.7 Close personal familiarity with Committee Members should be avoided, wherever possible, to prevent concerns about your objectivity when making decisions, or allegations of favouritism or bias.

- 3.8 Should a close relationship with a Committee Member or a work colleague develop, you should follow our Personal Relationships at Work policy with regard to when and how to bring this to the attention of your Manager or the Director. Prospect reserves the right to review your role and job description depending on the circumstances of a relationship, particularly where there is a line management issue also involved.

Health & Safety

- 3.9 You should ensure that in carrying out your duties you comply with all relevant requirements of the Health & Safety at Work Act 1974 and subsequent regulations and codes of practice, and that you do so with the highest regard to the health and safety of yourself, colleagues, tenants and all other users of our services, as appropriate.
- 3.10 You should ensure that you are familiar with our Health, Safety & Welfare policy and the relevant sections of the Health & Safety Manual, which is available on the intranet.

Misuse of alcohol and drugs, inappropriate behaviour

- 3.11 You must not be on duty under the influence of alcohol or non-medically prescribed drugs. This is a disciplinary offence which will be dealt with under our Disciplinary policy.
- 3.12 If you are attending a conference, seminar or other training event, or on behalf of Prospect are attending a work-related social event or anniversary celebration etc. (whether organised by others, or by Prospect - such as a Christmas meal) you should be aware that your conduct and behaviour may reflect positively or negatively on Prospect's reputation.
- 3.13 Inappropriate behaviour at any event, especially where this results from over-use of alcohol or non-prescription drugs, or any other unlawful, antisocial or other conduct at any time which may impact adversely on Prospect's reputation or position, may also render you liable to disciplinary action.
- 3.13 We wish to provide support and help if you have a problem relating to the use of alcohol or drugs. For full details, see the Alcohol & Drugs – Dependency or Abuse policy.

Gambling

- 3.14 No gambling is permitted on Prospect premises, with the exception of
- small raffles for charitable purposes,
 - national lottery syndicates;
 - occasional sweepstakes, e.g. for the Grand National.

Dress & appearance

- 3.15 We do not have a formal dress code for staff, except that where protective clothing is issued for safety reasons this must be worn at all time when required.

We do however expect you to be clean, neat and tidy in overall appearance, and to wear appropriate and practical clothing for the task or duty being undertaken, so that you present a positive, friendly image of efficiency and professionalism.

For further details see our Employees' Appearance procedure.

4.0 FINANCIAL PROBITY

Prospect's funds & resources

- 4.1 You must ensure that you use any Prospect funds or other resources (facilities, equipment, IT systems etc.) efficiently and for the purposes they have been provided for, complying with the law, our Financial Regulations and all relevant policies and procedures.
- 4.2 If you have direct access to Prospect funds you must ensure that you safeguard them from fraud or theft, and complete all records required accurately and promptly.
- 4.3 When making decisions on the use of funds or resources, you should seek to achieve maximum 'value for money', avoid or minimise waste, and ensure they are used carefully and protected.
- 4.4 You must not use Prospect funds or resources for personal benefit, and you must not in any circumstances mix your personal money with Prospect funds.

Relationships with Consultants, Contractors and Suppliers

- 4.5 If you have a link with any Consultant, Contractor or a supplier of any goods or services that we are using or are proposing to use, you must declare this and have it recorded in the Register of Interests, to comply with this Code and with our policy on Payments, Benefits and Corporate Accountability.

A 'link' may mean that you have a 'close relative', as defined in the policy, who is a Director or Manager in the company, or that you have a financial interest in the company and could benefit if they are working for Prospect.

If you are not sure if this applies to you at any time you should speak to your Manager or the Director.

- 4.6 You must not abuse your position as a member of staff in order to:
 - receive preferential treatment from any of our contractors or suppliers,
 - divert any of their resources or materials intended for Prospect, for your own use or use by any relative or friend etc. (which is fraud),
 - take incorrect or illegal advantage of an opportunity for Prospect to provide a service, including the provision of housing, for yourself, a close relative or another organisation.

Contracts, purchasing, staff appointments

- 4.7 If your duties involve making purchasing decisions, approving contracts or making staff appointments you should ensure that all your decisions are made fairly, impartially and on merit alone, and that you follow all relevant policies and procedures covering these activities.

Gifts and hospitality

- 4.8 You must ensure that you are aware of our arrangements for responding to offers of gifts of money or goods, or offers of hospitality. These arrangements are detailed in the Payments, Benefits and Corporate Accountability policy, which describes the types of gifts or hospitality that may and may not be accepted, and how any offers and/or acceptance must be reported to your Manager and recorded in the Gifts and Hospitality Register.
- 4.9 If you accept a gift or hospitality and have not complied with the policy you should be clear that you will be liable to disciplinary action (and in serious cases that you may also have committed a criminal offence – see below on bribery and fraud).
- 4.10 If you are not sure whether this applies to you at any time you should contact your Manager for advice.

Payments and benefits

- 4.11 Neither you nor any of your close relatives should gain personally through payments and benefits from Prospect, except as allowed under current law and any current guidance.

The Payments, Benefits and Corporate Accountability policy describes what is and is not allowed. It is important that you have read and understood this policy. If you have any questions please speak to your Manager.

Bribery & fraud

- 4.12 The Bribery Act 2010 defines a bribe as a “financial or other advantage” which is offered, promised or given to induce a person to perform a relevant function or activity improperly, or to reward them for doing so.
- 4.13 It is a criminal offence to offer, promise or give a bribe, and to request, agree to receive or accept a bribe. You should be aware that you may be prosecuted individually if you give or receive a bribe, and Prospect may be prosecuted for failing to prevent bribery committed by a member of staff.
- 4.14 The term ‘fraud’ covers acts of deception, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion.
- 4.15 Fraud is a criminal act and may be defined as:

“The use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to another party.”

The criminal act is the attempt to deceive. Attempted fraud will therefore be treated as seriously as accomplished fraud.

- 4.16 Computer fraud is where information technology equipment is used to manipulate programmes or data dishonestly (for example, by altering, substituting or destroying records, or creating false records), or where the use of an IT system is a material factor in the carrying out of fraud. Theft or fraudulent use of computer time and resources, including unauthorised browsing on the internet that breaches our Information Technology Use & Communications policy is included in this definition.
- 4.17 Our policy on Preventing Bribery and Fraud gives additional information and you should be aware of its contents. This is a key policy in ensuring that we maintain our reputation for integrity and honesty.
- 4.18 If you suspect or know of bribery or fraud taking place that involves a Prospect Committee Member or staff member you have a duty to report this as soon as you become aware of it, as detailed in the policy.

You have the right to report any suspicions etc. to the appropriate person or external agency under our Whistleblowing policy.

- 4.19 Anyone committing bribery or fraud will be liable for disciplinary action for gross misconduct, in addition to any criminal prosecution they may face.

5.0 EXTERNAL RELATIONSHIPS

Balancing Openness and Confidentiality

- 5.1 Our aim is to be as open as we can about our activities, our decisions and the reasons behind them. However we have to balance that aim with the need to keep certain kinds of information confidential, unless there is a legal requirement to publicise it or make it available if requested.
- 5.2 You should make sure that you are clear about the types of information that must remain confidential. The main types will be:
- personal information held about individuals (tenants, applicants, Committee Members, staff, other users of services), subject to the right of the individual to have access to the information held about them under current data protection legislation;
 - matters relating to our business activities, financial transactions, new business plans, staffing matters, except where publishing the information is permitted or required by law, e.g. publishing annual accounts;
 - matters relating to contracts for the supply of goods and services, and the business of our contractors, suppliers, lenders and any other third parties with which we have or may have business or commercial relationships;
 - matters related to or concerned with legal disputes, actions or similar activities involving Prospect;
 - any other matter which is specifically identified as being confidential or which, given its nature, may be regarded as being confidential to Prospect.
- 5.3 You should ensure that you have the written permission of the Director before you pass on any of the above types of information. For further details see the Openness and Confidentiality policy.

Data Protection & document retention/disposal

- 5.4 When processing information, including the personal details of individuals, you must ensure that you comply with the requirements of the Data Protection Act 1998 and subsequent guidance at all times. For further details see the IT System Security procedure.
- 5.5 Where required under our Retention of Documents policy, records must be kept in safe, secure storage either in paper form or on the IT system, for the minimum length of time specified, following which they must be safely disposed of, including by shredding if required to ensure no unintentional release of personal or sensitive data as defined by the Data Protection Act.

Copyright

- 5.6 All records, documents, papers, reports etc. regarding Prospect's administration and financial affairs, whether in paper or electronic format, remain Prospect's property at all times and must not be reproduced for external use or circulation without the approval of your Manager or the Director.

Public statements

- 5.7 Unless you are authorised to do so by the Director, you should not make any public comments on behalf of Prospect, e.g. to the media or any other organisation, about any aspect of our activities.

The designated press and media spokespersons for Prospect are the Director and Chairperson (or Vice Chairperson).

Use of IT Systems, emails & internet access

- 5.8 The security of our IT systems and the correct use of emails and access to the internet are essential to the provision of our services and the maintaining of high standards of personal and professional conduct.
- 5.9 Before you were permitted access to our IT systems you will have read the IT System Security policy and the Information Technology Use & Communications policy, and you will have signed the Agreement on the use of Prospect's IT Systems. You should ensure that you comply with the requirements of these policies and any related procedures, and that if you have any questions you raise these promptly with your Manager or the IT Officer.
- 5.10 We appreciate that most people contribute to 'social media' sites in one way or another. It is important therefore that, as a Prospect staff member, you remember the following key points:
- a) Unless you are authorised to do so on a work-related site as part of your duties, you should not deliberately identify yourself as a Prospect staff member or that you are linked to Prospect in any other way, on any blog, content sharing or social networking sites.
 - b) When contributing to websites you should at all times ensure that your conduct is appropriate and consistent with your contract or appointment, and that you do not bring any disrepute to Prospect's name. If there is any likelihood that the content could identify you with Prospect you will ensure that a disclaimer is added stating that the views expressed are personal and do not represent Prospect's views.
 - c) You should not make any defamatory, actionable or untrue statements about colleagues or anyone else associated with Prospect, or about your work or the organisation, on any blogs, content sharing or social networking sites, either within or outwith working hours.

Political campaigning and outside activities

- 5.11 Prospect has no wish to interfere in your private life, but it is important to realise that some outside activities can have a negative effect on your ability to carry out your duties, or on the Prospect's work overall.
- 5.12 You should not therefore support or participate in any initiative, activity or campaign, whether promoted by a political party or a specific interest group, which is intended to or which may have the effect of adversely affecting Prospect's interests, whether directly or indirectly, or which has a direct negative affect on your personal work performance.

- 5.13 If there is a possibility that any personal interests or activity you may be involved in could have this affect, you should discuss this with your Manager or the Director as soon as you become aware of it.
- 5.14 In carrying out your duties you should not show any bias towards any political party or other interest group, and must not allow your own personal or political opinions to affect your work or your impartiality.
- 5.15 This requirement does not limit your right to be an active citizen, and we would encourage every staff member to participate in local and national civic life to the extent that they wish to and are able to.
- 5.16 The important principle is that any outside activity must be kept separate from your duties and responsibilities at work, and must not detract from the performance of your duties or Prospect's reputation and objectives.

Public service and duties

- 5.17 If you are thinking of applying to be appointed to a public body or similar activity which will require your attendance during what would be your Prospect working hours, please discuss this first with your Manager to identify the implications for your own workload and that of your department.

For further details, see the [Time Off for Public Service & Duties](#) policy. This policy also covers time off for jury duty.

Other employment

- 5.18 You must not undertake any outside work paid by others during your Prospect working hours, or requiring the use of Prospect office facilities.
- 5.19 If you are thinking of undertaking other paid employment outwith your Prospect working hours you should discuss this with your Manager before accepting any position, to identify any implications for your workload and that of your department.

6.0 WHISTLEBLOWING

- 6.1 The term 'whistleblowing' refers to the action of an individual within an organisation bringing a matter of concern, normally a potentially serious matter, to the attention of the appropriate senior person in that organisation, or to a relevant external organisation.

Normally such action follows unsuccessful attempts to raise the concern through 'normal channels', but there will also be situations where this may not be possible and 'whistleblowing' is the only option available.

- 6.2 You have a duty to raise any matters of concern you may have about Prospect's actions or activities, or those of individual Committee Members or staff. In the first instance you should raise these with your Manager, or, if this is not appropriate, with the Director (or the Chairperson if the concern involves the Director).
- 6.3 Where you feel that, having reported the matter to the relevant person, the issue is not being addressed appropriately, you should follow the guidance in the Whistleblowing policy.

7.0 BREACHES and FAILURES

- 7.1 A breach of or failure to follow this Code may have serious consequences for Prospect. Our work and/or reputation may be damaged as a result of a staff member's actions or omissions.
- 7.2 If you breach or fail to follow this Code, this may result in disciplinary action being taken against you.

8.0 POLICIES and PROCEDURES

- 8.1 The issues discussed in this Code are covered in a range of policies which have been approved by the Management Committee, together with supporting procedures.
- 8.2 As part of your compliance with this Code, you should ensure that you know where to access copies of current policies and procedures relating to your duties and responsibilities, and that you familiarise yourself with their content and review it regularly.
- 8.3 You should raise with your Manager or the Director any need for clarification of specific points, or training in any aspect of a policy or procedure, where you feel this is necessary to ensure you are clear about your role and responsibilities.

If you feel a policy or procedure could be improved, or should be amended/updated, you should discuss your ideas with your Manager.

9.0 CONCLUSION

- 9.1 This Staff Code of Conduct will be reviewed and updated as required, following consultation with staff where appropriate.
- 9.2 The Director is responsible for ensuring that this Code is reviewed by the Management Committee at least every 3 years.

Approved by the Management Committee on 31 May 2017

Next review due by: May 2020.



CODE OF CONDUCT FOR MEMBERS OF STAFF - DECLARATION

As a member of staff of Prospect Community Housing Ltd. (the Association), I acknowledge and accept the Association's Staff Code of Conduct and agree to be bound by its terms. In particular, but without limitation, I agree:

1. to declare all my interests, be they employment, positions of responsibility, membership of other Registered Social Landlords or other groups in Wester Hailes, directorships and any financial interests that may relate to the work of Prospect;
2. not to receive any financial remuneration for my work for the Association other than what is currently permitted by law and my contract of employment;
3. to ensure that any private or personal financial or non-financial interests never influence my decisions in connection with Prospect's work and that I will never use my position as a member of staff for personal gain of any kind;
4. to disclose any direct or indirect pecuniary interest or other non-pecuniary interest in any contracts or business to be considered by Prospect, and ensure that I am not involved in any recommendations or decisions regarding such contracts or business;
5. to treat as confidential all information relating to the business, policy, organisation, management, future plans, clients, tenants and staffing of Prospect to which I have access and which the Code of Conduct and relevant policies do not permit me to disclose;
6. to ensure that all electronic data to which I have access is stored securely;
7. not to part with possession of or to reproduce any of Prospect's correspondence, documentation or internal memoranda for the benefit of third parties without the express permission of the relevant manager;
8. ensure that at all times I adhere to Prospect's policy on Payments, Benefits & Corporate Accountability, and in particular not to accept gifts, other than those of a trivial nature, nor to receive or offer in the name of Prospect excessive or extravagant hospitality;
9. to not, without first raising the matter with the Director, knowingly use the services of a current consultant, contractor, personal advisor or other individual or firm who works for or provides services to Prospect;

Signed _____ Date _____

Name (please print) _____

PROSPECT EQUALITY IMPACT ASSESSMENT RECORD

Title of policy/ practice/ strategy	PER21 Staff Code of Conduct	
Department	Corporate	
Who is involved in the EQIA?	Management Team/Julie Thynne	
Type of policy/ practice/ strategy	New <input type="checkbox"/>	Existing <input checked="" type="checkbox"/>
Date completed	05/04/2017	

Stage 1: Screening Record

What is the main purpose of the policy?

The policy sets out the code of conduct expected of staff members.

Who will the policy benefit and how?

The policy will benefit staff, tenants, service users and other partner agencies by providing clear guidance on the code of conduct expected.

For each equality group, does or could the policy have a negative impact?

Protected characteristic	Negative	Positive/no impact	Don't know
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy & maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or belief (including no belief)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you answered negative or don't know to the above question you should consider doing a full EQIA.

Are there any potential barriers to implementing the policy?

There are no identified barriers.

	Yes	No
Is a full EQIA required?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you answered no to the above question explain why a full EQIA is not required:

No impact on equalities identified:	<input type="checkbox"/>
Other: The policy sets out the code of conduct expected. This should have a positive impact on all protective characteristics and areas of potential discrimination. All equality and diversity issues should be considered when investigating potential breaches of the code.	