

# Clarion's Supplier Code of Conduct



## 1. Our Standards

### 1.1 Acting in the best interests of Clarion and its residents

You have a responsibility to discharge your role in line with Clarion's purposes and values.

#### 1.1.1 Meeting your responsibilities

We expect your staff to fulfil their duties and obligations responsibly, acting at all times in good faith and in the best interests of Clarion and for the delivery of its strategic objectives. 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 procedure set out in Section 6, [Contact Us](#).
- Always seek to further Clarion's strategic objectives, reflecting Clarion's desired culture.
- 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.
- Consider the impact of your actions and ensure they do not negatively impact on the safety and wellbeing of residents.

#### 1.1.2 Representing Clarion

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

- Not make derogatory, false or otherwise damaging comments, in person or through any medium, about Clarion or any person, service or organisation connected with it. (i.e. You must not seek to officially represent the views or position of Clarion without prior authority).
- Make clear in what capacity you are communicating where any personal social media accounts refer to your role with Clarion. Obtain prior consent if you intend to engage in an activity, including political or campaigning activity, which may reasonably be regarded to affect Clarion. Such consent will not be unreasonably withheld unless your activity poses a material risk to Clarion.

You must not conduct yourself in a manner that could reasonably be regarded as bringing Clarion into disrepute.

## 5.2 Behaving with integrity

The reputation of Clarion depends on compliance with this Code, and with the laws, policies and procedures it refers to. The integrity of those involved with Clarion needs to be beyond doubt, and seen so to be.

### 5.2.1 Conflicts of Interest

You must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between your duties to Clarion Housing Group and your personal interests, other duties and relationships.

You must:

- Formally declare to Clarion, at the earliest opportunity, any interests which may, or may be perceived to or may in the future, conflict with the duties of your role.
- Declare any '[Known Relationship](#)' to:
  - A person applying for, or performing, a role within Clarion and you must not be involved in their appointment, performance management or reward.
  - A resident, potential resident or other customer of Clarion. You must not be involved in decisions relating to their relationship with Clarion, or seek or accept preferential treatment for them.
  - A person or organisation seeking appointment as a contractor or supplier to Clarion and you must not be involved in their appointment, performance management or reward.

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.

### 5.2.2 Gifts, hospitality and bribery

In your role with Clarion, 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 or employment.

- Any gifts or hospitality offered to or by you must be either declared or declined. Please see section 6, [Contact Us](#).
- 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 see Section 6, [Contact Us](#).

### 5.2.3 Funds, resources and personal benefit

You must ensure that Clarion's funds and resources are used properly and efficiently.

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

#### **5.2.4 Confidentiality**

You must process information in accordance with the law and [Clarion's Data Protection Policy](#). You must not:

- Disclose, without the required permission and authority, any personal data about tenants, customers, staff or colleagues.
- Disclose, without authority, any confidential or sensitive business information. This duty continues to apply after you have left Clarion and stepped down from your position.
- Without authority, pass or distribute to the press or media or any other external recipient(s) any unpublished information or materials relating to Clarion - unless you are doing so in accordance with [Clarion's Whistleblowing Policy](#).
- Prevent another person from gaining access to information to which they are entitled to by law.

### **5.3 Conducting yourself professionally and treating others well**

Professionalism, consideration and respect for others, and a commitment to the principles of equality, diversity and inclusion, are fundamental to the delivery of Clarion Housing Group's social purpose.

#### **5.3.1 Respect for others**

We require you to treat all others with respect and consideration.

You must:

- Treat everyone you meet in the performance of your role with equal respect, care and consideration.
- Show respect for individuals' chosen identities.
- Promote, through your own behaviours, an organisational culture that is welcoming, accepting and accommodating to people of all backgrounds, cultures and personal and protected characteristics.
- 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.

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.
- Display materials in your workplace or use language in the performance of your role which other people might reasonably find offensive.

### **5.3.2 Working with residents and other customers**

You must be professional, fair and courteous in all your dealings with residents and other customers.

- You must seek and value views from residents and other customers when making decisions that will affect them.
- You must not allow any personal relationship with a resident or other customer to influence how you discharge your role and responsibilities.
- You must not give personal gifts or loans of money to, or receive personal loans or gifts of money from, residents or other customers.
- You must handle residents' and other 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 Clarion's [Financial Regulations](#), procedures and controls to ensure appropriate handling of any and all funds.
- You must not invite or influence a resident or other customer unless they are a person who you are closely connected to, to make a will or trust under which you are named as executor, trustee or beneficiary.
- You must not engage in any private work for residents should be undertaken unless explicit, written approval has been sought and granted by Clarion Housing Group.
- You must ensure that your staff carry identification at all times and make it readily available for residents and Clarion staff.

### **5.3.3 Professional relationships**

You must maintain constructive, professional relationships with staff and involved residents, based on a sound understanding of their respective roles.

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

### **5.3.4 Performance Management**

You must play an active part in Clarion's supervision and performance appraisal processes insofar as they apply to you.

## **5.4 Protecting yourself, other people and the environment**

You have a responsibility while on Clarion business to protect your own health, safety, security and wellbeing and that of others, and to eliminate harmful environmental impacts.

### **5.4.1 Health, safety and security**

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

- You must not knowingly put your own or others' health, safety, security or wellbeing unnecessarily at risk.
- If you have any concerns about the health, safety, security or wellbeing of yourself, another individual or a group of individuals connected with Clarion, you must report this immediately - see section 6, [Contact Us](#).

#### **5.4.2 Protecting and enhancing the environment**

Clarion aspires to be a business that is a force for good for both people and planet. We aim to deliver quality, net zero carbon homes that improve access to nature and are built for the future.

In carrying out actions or making decisions in the performance of your role, you must therefore consider the environmental impact of your work and ensure at all times that you are operating in a way which meets Clarion's sustainability objectives, targets and policies. See Clarion's [Group Sustainability Policy](#) and [Sustainability Strategy](#) for further information.

You must comply with all relevant environmental legislation and report any known environmental incidents associated with your work directly to Clarion. You must avoid negative environmental impacts, and deliver positive environmental outcomes.

## **2. Contact Us**

You must report any concerns about possible wrongdoing by emailing [speakup@clarionhg.com](mailto:speakup@clarionhg.com). This includes becoming aware of potentially dishonest or fraudulent activity, material breaches of this Code or relevant legislation (including health and safety or environmental), or being required to act in a way which conflicts with this Code or legislation.

You must not victimise or disadvantage any person who uses or intends to use Clarion's confidential reporting ([Speak Up Policy](#) / Whistleblowing) to report actual or alleged wrongdoing.

If you have a query or concern or wish to escalate a situation that you are uncomfortable with ("whistleblowing"), please contact our Head of Governance via [speakup@clarionhg.com](mailto:speakup@clarionhg.com). You must report to us any corrupt or illegal practice in connection with your business with us. You should never be obliged to commit a breach of the law or this Code to retain Clarion's business.

CONTACT:  
Head of Governance  
Email: [speakup@clarionhg.com](mailto:speakup@clarionhg.com)

## Glossary

Term	Definition
<b>Suppliers/contractors</b>	Includes those other than board members, staff and involved residents who are directly involved in delivering the housing association's business activities. This includes contractors, sub-contractors, consultants and agents.
<b>Staff member and staff</b>	Includes Clarion's employees and any other persons fulfilling the role of a paid employee, such as those deemed to be workers, interim placements, or those on secondment from another organisation.
<b>Residents and other customers</b>	Includes residents, tenants, leaseholders, shared owners and users of other services provided by Clarion.
<b>People with whom you are 'closely connected'</b>	In broad terms, this means your family, relatives or business partners as well as people connected with businesses in which you have an interest through ownership or influence. The term includes your spouse or unmarried partner or civil partner, children, siblings, grandchildren, grandparents and any other family members.
<a href="#"><u>Microaggression</u></a>	Is a term used for brief and commonplace verbal, behavioural or environmental slights that may communicate hostile, derogatory, or negative attitudes towards certain groups of people.
<b>Known Relationship</b>	For the purposes of this code means related parties and close connections, it is not envisaged that relationships with acquaintances should be covered by this term.
<b>Clarion Housing Group</b>	<p>Clarion Housing Group Limited is a charitable Registered Society (Registration Number 28038R). Clarion Housing Group Limited is regulated by the Regulator of Social Housing (RSH) (Registration Number LH4087).</p> <p>The Registered Office is: Level 6, 6 More London Place, Tooley Street, London SE1 2DA</p> <p>This code applies to all the <a href="#"><u>entities associated with Clarion</u></a>. All companies registered at Companies House are registered in England and Wales.</p>

## Related policies

This Code sets out Clarion's expectations in line with its own policies, particularly as set out in the following:

- Data Protection Policy
- Speak Up Policy / Whistleblowing
- Financial Regulations
- Group Sustainability Policy
- Group Sustainability Strategy.

See [Section 6, Contact Us](#), on how to access to these policies.

## Policy Control Information

<b>Date first issued</b>	
<b>Version number</b>	V1.0
<b>Date effective</b>	
<b>Date of Next Review</b>	
<b>Policy Owner</b>	John Wallace
<b>Policy Author</b>	
<b>Approved by</b>	
<b>Associated Strategy</b>	
<b>Policy Audience</b>	All staff/supplier/contractors
<b>Published externally</b>	yes

## Version History

<b>Version no.</b>	1	<b>Date effective:</b>	
<b>Summary of changes</b>			
<b>Approval</b>			
<b>Policy Author</b>			

<b>Version no.</b>	2	<b>Date effective:</b>	
<b>Summary of changes</b>			
<b>Approval</b>			
<b>Policy Author</b>			