

Ongo Homes Customer Engagement Code of Conduct February 2020

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V7	Annual Review	9/3/2020	Community Voice (CV)	April 2023
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1. Our policy is...

- 1.1 At Ongo, we seek to engage our tenants and residents of our communities in the design, planning and delivery of our services. We are committed to developing and supporting various forms of active customer engagement that supports our vision of creating and sustaining truly vibrant communities.
- 1.2 In order to ensure positive and effective engagement with our tenants and residents, we expect certain levels of behaviour and conduct. These support our vision and values and ensures consistency across our tenant and resident panels when working with and representing Ongo Homes.

2. It applies to...

- 2.1 This Code of Conduct is mandatory for all Ongo Homes affiliated and supported resident groups and applies to all individual Customer Engagement volunteers (referred to hereafter as volunteers throughout) who participate or who are engaged in one or more customer engagement activity.
- 2.2 This code of conduct **does not** apply to any Ongo Homes resident who is engaged as a regular volunteer through the Opportunities Team – i.e. with our Caretaking Team.

3. Because we want to...

- ✓ Provide a framework for the conduct of volunteers engaged in any form of Customer Engagement activity to ensure tenant and resident volunteers are able to fulfil their defined roles and responsibilities and to ensure pro-active steps are taken to deal with individuals who display inappropriate behaviour as part of any customer engagement activity; and
- ✓ To provide support to our volunteers when using the various forms of social media, ensure they make proper use of such platforms as part of their volunteering role and that Ongo's values are upheld to minimise the reputational risks to the business.

4. We will...

- 4.1 The different roles and responsibilities of Customer Engagement volunteers and Ongo Homes staff will be mutually valued and respected.
- 4.2 Ongo Homes will not grant volunteers any special benefit or consideration because of their position.
- 4.3 Volunteers recognise that they do not have authority over Ongo Homes staff or Contractors working on their behalf;
- 4.4 Ongo Homes staff recognise that they are accountable for meeting their commitments to volunteers in the context of joint activities;
- 4.5 All interactions between volunteers and Ongo Homes staff will be governed by principles of respect and of the understanding that they both have varied and different roles to each other.

4.6 Volunteers must not intend to damage or bring into disrepute the reputation of any Ongo Homes project or customer engagement group structure.

4.7 Maintaining confidentiality

4.7.1 Volunteers have access to a lot of information about Ongo Homes and its customers and suppliers, so extreme care needs to be taken regarding disclosure especially as some of this information could be personally or commercially sensitive;

4.7.2 At all times volunteers should respect confidential issues relating to other residents/Ongo Homes staff and refrain from mentioning or passing on information relating to specific individual cases which are of a defamatory, slanderous, or libellous nature to Ongo Homes, its staff, residents and other stakeholders;

4.7.3 Any information or items shared with Ongo Homes that are of a confidential nature must not be disclosed to anyone else apart from members of the group the information is intended in order to allow the business of a meeting to take place or to allow a person to carry out their role as a volunteer (in certain circumstances, volunteers will be expected to sign a separate confidentiality agreement should their role require it. E.g. resident scrutiny panel members);

4.7.4 If volunteers have any doubt about whether information is confidential or not, then they should clarify with the Customer Engagement Team.

4.8 Conflicts of interest

4.8.1 A conflict of interest occurs when personal or business interests affect a volunteer's ability to fairly and objectively represent the best interests of residents or their community. The interest may benefit family, friends or a business enterprise with which the volunteer is associated with. Volunteers must:-

- Not use their position for personal gain;
- Declare any relationships with staff/Board members, ensuring that appropriate professional boundaries are maintained;
- Use appropriate Ongo Homes channels and procedures to access services for either themselves, family and /or friends, e.g. reporting repairs, complaints etc.;
- Declare to Ongo Homes and/or their peers when they are in a possible conflict of interest position and they have a personal, financial or material interest in any matter being considered. They must also absent themselves from any discussion or decision on matters in which they have or may have a conflict of interest in.
- Notify the Customer Engagement Manager if they are a volunteer on any of the Customer Engagement groups if you secure a job with Ongo. A decision will be made if there will be a conflict of interest in you undertaking the job alongside your volunteering capacity.

4.9 Carry out responsibilities with diligence

4.9.1 Ongo Homes will make reasonable checks on volunteers they feel are deemed to be necessary by working in accordance with the Rehabilitation of Offenders Act 1974.

4.9.2 Volunteers act on behalf of other residents and their respective communities and are in a position of trust, therefore they must:

- Take responsibility for transparency and honesty by declaring any criminal convictions (new or historical) in confidence, regardless of whether they are 'spent' or 'unspent', to the Customer Engagement Manager. A risk assessment will then be carried out on the individual to:
 - a) Ensure there is no risk to staff or customers;
 - b) Ensure there are no issues that could potentially damage the reputation of Ongo Homes or the engagement activity role; and
 - c) Identify any fraud / theft convictions which may have an impact on monetary activities.
- Notify the Customer Engagement Team if they have a physical or mental health issue or disability. A risk assessment will be undertaken to ensure we can provide the necessary support or adjustments that will assist individuals in being involved.
- Seek remuneration only for legitimate, agreed-upon expenses incurred as part of their role in line with the Customer Engagement Expenses process.
- Where finances are concerned:-
 - a) Ensure that they follow the proper Ongo Homes guidelines (e.g. setting up bank accounts, signatories etc.)
 - b) Respond positively and in a timely manner to any information required or requests made by Ongo Homes
 - c) Take reasonable care in the management and accounting of funds
 - d) Ensure that accounts are accessible and available for audit checks
 - e) Ensure effective consultation takes place with any respective group members on income and expenditure items
 - f) Ensure that they attend relevant training sessions to keep their knowledge and awareness up-to-date
 - g) Control the use of funds for their proper use
 - h) Not obtain a personal gain or achieve ulterior objectives

4.10 ICT Equipment & Social Media

4.10.1 Volunteers will take reasonable care of any ICT equipment provided and use any equipment that has been made available for their personal use, for the purpose that it was originally intended for (e.g. use of laptop to record /promote activities relating to their respective group, in line with the Information, Security and Acceptable Use Policy).

4.10.2 Volunteers will report any theft of equipment supplied by Ongo Homes or which has been funded from other sources for use in respect of storing documents relating to Ongo Homes and the volunteer role to the Police and Customer Engagement Team.

4.10.3 Social media is a great way to communicate and build new relationships and our volunteers should use it to promote information or reminders about relevant groups, meetings, Ongo Homes, specific roles (i.e. Tenant Inspectors) or your community.

4.10.4 Volunteers act on behalf of other residents and represent local communities which means they are in a position of trust, therefore they must consider the type of information they are sharing on social media.

4.10.5 Volunteers must always be open, fair and inclusive, respectful and positive in their social media posts and responses to others. They must lead by example and conduct their role in such a way that is inclusive of all tenants and residents. As such they must actively promote equality of opportunity and eliminate all negative forms of discrimination.

4.10.6 Volunteers must not, under any circumstances:

- Divulge personal information on social media, either your own or others'. This includes issues referred to that could pose a risk to staff members or other residents. Please note: in line with the new data protection law you must always check that new members of a group or other volunteers are happy to share contact information;
- Post any content that could potentially damage the reputation of Ongo Homes, including any of the community groups and volunteers;
- Use any discriminatory or abusive comments against any other residents, Ongo Homes staff or its partners when using social media to share information;
- Claim to represent Ongo Homes, any part of the Ongo Group or associated group or committee; or
- Exclude anyone from being involved in an Ongo recognised social media group (with the exception of closed groups such as the Community Voice Facebook Group) without a valid reason – this must be discussed with the Customer Engagement Team first.

4.11 Harassment

4.11.1 Harassment means improper comment or conduct that a person knows or ought to know would be unwelcome, offensive, embarrassing or hurtful. Volunteers:-

- Must not exert or attempt to exert undue or inappropriate influence on residents or Ongo Homes staff or behave in a manner that may be perceived as intimidating or threatening;
- Must not try to influence outcomes with threats, bribes or inducements; and
- Must not behave in an abusive way towards other residents, Ongo Homes staff and partners. For example:-
 - a) Initiating or spreading hurtful rumours

- b) Swearing at someone (includes using obscene language, name calling)
- c) Using insulting behaviour (includes making threatening gestures or remarks)
- d) Making physical threats
- e) Assaulting someone physically or sexually
- f) Creating unwanted sexual attention

4.12 Fairness, Respect, Equality, Diversity, Inclusion & Engagement (FREDIE)

- 4.12.1 Volunteers must ensure that the role they undertake on behalf of, and for the benefit of, the wider resident base and Ongo Homes communities promotes inclusion and is available to all, irrespective of race, religion or belief, age, sex, disability, sexual orientation, marriage/civil partnership status, pregnancy or maternity status, or transgender status¹.
- 4.12.2 Volunteers shall not discriminate on any of the above grounds against any other residents, Ongo Homes staff or its partners.
- 4.12.3 Volunteers must be seen to lead by example and conduct their role in such a way that is inclusive of all residents. As such they must operate within the spirit of FREDIE and actively promote equality of opportunity thereby ensuring that they eliminate all negative forms of discrimination in the way they work.
- 4.12.4 All Volunteers must work co-operatively with their peers, acknowledging that no two individuals are the same and have differing levels of time available and commitment they are able to dedicate to involvement activities. . Everyone has the right to be involved at a pace and level of their choosing, with all contributions being valued.
- 4.12.5 Regardless of the involvement structure, all volunteers should respect the difference of opinions from their peer group, especially as differences of opinions are bound to happen from time-to-time. Whilst freedom of speech and expression of views is encouraged and welcomed, volunteers need to be mindful of what they say, where they say it, who they say it to and the impact it might have on others. Even though individuals may not personally agree with the views and opinions of others they must be prepared to talk their differences through and accept any majority decisions made after the discussion
- 4.12.6 All volunteers should regularly familiarise themselves with the respective terms of reference or constitution of the structure that they are involved with. In doing so they will ensure that their individual input contributes to the successful achievement of aims and objectives.

4.13 Public Relations

- 4.13.1 For the purposes of this policy, 'press' and 'media' relates to all printed, broadcast and online news reporting facilities, including local paid-for and free newspapers, village newsletters and magazines, radio and television news, online news sites.

¹ Recognised nine protected characteristics of the Equality Act 2010

- 4.13.2 Articles/information may only be submitted to the press and wider media on behalf of a particular customer engagement structure if discussed, agreed and recorded at an official group meeting by the Customer Engagement Team through Ongo's PR & Communications Team.
- 4.13.3 Volunteers submitting personal articles to the press must only refer to that which is of personal interest and must, in no way, claim to represent Ongo Homes, any part of the Ongo Group.
- 4.13.4 If a volunteer is approached by any media organisation, or representative of a media organisation, and asked to comment in an official capacity on a matter relating to Ongo Homes, the Ongo Partnership, or any activity associated with the Partnership, they should contact the Customer Engagement Team who will seek advice from PR prior to any official comments being made.
- 4.13.5 Volunteers who communicate information via social media which includes Facebook and Twitter must refer to their comments as being of personal interest and in no way claim to represent Ongo Homes, any part of the Ongo Partnership or associated group or committee
- 4.13.6 If a volunteer is asked to comment, as a tenant, on activities relating to Ongo Homes or the Partnership, they have the right to do so. Professional advice on dealing with media interviews is available from the PR Team to help and support individuals in such situations.

4.14 Political affiliation

- 4.14.1 Residents may be affiliated to or be members of a political party but they cannot represent a political party in their role as a volunteer or member of any of the other customer engagement group structure.
- 4.14.2 Volunteers must not be involved with extremist beliefs, organisations and/or terrorist activities. The Government has defined extremism as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'.

4.15 Conduct at meetings

- 4.15.1 All volunteers, wherever possible, will have equal status at meetings.
- 4.15.2 Volunteers should at all times observe accepted codes of practice and procedures whilst taking part in meetings:
- To be courteous to each other and support and assist others in seeking the best possible solution to issues being discussed
 - To respect the role of, and follow the guidance of the Chair during the meeting
 - To follow the agenda, stay on topic and to help each other to reach effective decisions
 - To remember that the purpose of the meeting is to benefit residents generally and not specific individuals
 - To bear in mind the rights of individual residents and the duties of staff when proposing solutions to problems

- To operate within the guidance set out in either the relevant constitution or terms of reference
- The Chair should welcome members and invited guests to the meeting

4.15.3 The Chair should ensure that no one individual dominates the meeting (including themselves) and those issues relevant to the current agenda item are only discussed. All members during the meeting have a responsibility to ensure that this is adhered to.

4.15.4 All speakers should go through the Chair and keep to the subject being discussed. Only one member should speak at a time and there should only be one conversation at any one time

4.15.5 When a member raises a topic that creates a personal and/or prejudicial conflict of interest, the Chair must bring that person to order.

4.15.6 If volunteers are involved in more than one group they must avoid raising issues which have already been discussed in other groups. This will help to avoid any confusion.

4.15.7 Meetings must start at the stated time and abide by the agenda. Late arrivals should enter quietly and not disrupt the meeting with apologies

4.15.8 Jargon must be avoided wherever possible. If it is used then a full explanation should be given.

4.15.9 It is the responsibility of each member to ensure they are prepared for the meeting by reading all the relevant papers, preparing questions in advance and bringing them to the meeting.

4.15.10 The guidance above helps Ongo Homes staff, or officers of a residents' group to ask individuals that do not keep to the code to leave the meeting, or if the breach is persistent, to exclude the individual from attending further customer engagement meetings.

4.16 Breaches of the Customer Engagement Volunteer Code of Conduct

4.16.1 Ongo Homes shall investigate all breaches of the code that are brought to their attention. If any volunteer or member of staff experience a breach of the code and want to report this, they must do so in writing within 14 days of the incident taking place to the Customer Engagement Manager. In the first instance the Customer Engagement Manager will:-

- Write to the individual detailing the nature of the allegation and complaint received
- Arrange a meeting with the individual to discuss the issues further and to advise on the expected future conduct of the individual, monitoring period, and any actions required of the individual (e.g. to undertake training)
- Outline the consequences for the individual should unacceptable behaviour or actions continue which constitute a breach of the code of conduct
- Confirm discussions of the meeting in writing to the individual concerned

- Provide feedback to the relevant customer engagement group structure detailing any advice given to the individual concerned and any course of action agreed at the meeting with the individual

4.16.2 In certain circumstances, any violation of the Code of conduct may also result in a violation of legislation which could result in legal implications (e.g., data protection).

Note

- The only instance where Ongo Homes will not investigate any alleged breach is where resident associations or community groups themselves, as part of their constitution (section 5), are able to deal with code of conduct of issues within their specific group. Ongo Homes will provide optimum levels of support to Chairs and Vice Chairs should such situations occur.

4.17 Outcomes

4.17.1 The emphasis shall be on providing training, advice, support to ensure that the individual does not commit any further breach.

4.17.2 Dependent on the severity of the situation, Ongo Homes may also consider carrying out the following:-

- A warning letter from the Customer Engagement Manager stating that any repeats over a defined time period could result in the individual being excluded from participating in all Ongo Homes recognised customer engagement activity, temporary suspension from attending meetings (Community Voice or any other customer engagement group structure) for either a 3 month or 6 month period. Where a letter is not the most appropriate form of communication, every effort will be made to ensure the warning is communicated to the resident in a way that they understand.
- In extreme or repeat cases, customer engagement volunteer status could be revoked and the individual suspended from all Ongo Homes customer engagement activities for a period of 12 months. If the person were representing a residents association or community group at the time of his/her status being revoked, Ongo Homes would contact the relevant group stating that should the committee wish the individual to continue to represent their group, then Ongo Homes support and recognition of the group may be withdrawn. At the end of the 12-month suspension period if the person wishes to participate once again in any resident involvement activity structures, the person must re-apply in writing to Ongo Homes for permission to re-join. The Customer Engagement Manager will then write to the person explaining that permission is granted but that the volunteer will be on a probationary period for the first six months
- If the volunteer breaches the Code during the six month probationary period, then he/she will be subject to immediate suspension pending investigation, which may result in a further suspension or a permanent exclusion from voluntary work at Ongo Homes and any recognised customer engagement activities.

4.17.3 In addition, if Ongo Homes has issued notice of legal action against a volunteer for any reason in relation to their tenancy then Ongo Homes may advise the volunteer that they will be suspended from all voluntary work and customer engagement activities until the outcome of the legal action is known.

4.17.4 Volunteers should notify customer engagement if they are issued with a notice of legal action by Ongo Homes in relation to their tenancy

4.18 Right of Appeal

4.18.1 Volunteers have a right of appeal and should do so verbally or in writing to the Customer Engagement Manager within 14 days of notification of action to be taken. An investigating officer will then be appointed by Ongo Homes to re-investigate the case. Following the investigation, the relevant Head of Service will determine the nature of the appeal.

5. Making sure we do what we say...

5.1 The Customer Engagement Manager has overall responsibility for the policy and for monitoring its effectiveness.

5.2. Members of the Customer Engagement team and all volunteers are responsible for ensuring that they understand and comply with the code and that it is implemented on a day-to-day basis.

5.3. It is the responsibility of all volunteers to ensure that the code of conduct is maintained and adhered to.

6. Other things to bear in mind...

- ✓ Information, Security and Acceptable Use Policy
- ✓ Ongo's Professional Boundaries Policy
- ✓ Data Protection Act 2018 & GDPR
- ✓ Equality Act 2010

7. We'll look at this again...

7.1 This Code of Conduct will be reviewed every 3-years unless anything changes that necessitates an earlier review.

7.2 Changes to the code shall be communicated in writing to all volunteers.