



Ongo Homes Customer Engagement Volunteer Code of Conduct

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Manager**

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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 ensure 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...

- Ensure tenant and resident volunteers are able to fulfil their defined roles and responsibilities
- Provide a framework for the conduct of volunteers engaged in any form of Customer Engagement activity
- To provide support to volunteers when using the various forms of social media, to ensure they make proper use of these platforms as part of their volunteering role and that Ongo's values are upheld to minimise the reputational risks to the business and other residents
- To enable Ongo to be able to take pro-active steps to deal with individuals who display inappropriate behaviours

4. We will...

- 4.1 The different roles and responsibilities of Customer Engagement volunteers and Ongo staff will be mutually valued and respected.
- 4.2 Ongo will not grant volunteers any special benefits or consideration because of their volunteering position.
- 4.3 Volunteers recognise that they do not have authority over Ongo staff or Contractors working on their behalf.

- 4.4 Ongo 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 staff will be governed by principles of respect and of the understanding that they both have varied and different roles to play.
- 4.6 Volunteers must not intend to damage or bring into disrepute the reputation of Ongo, its staff, other volunteers or tenants and residents at large.
- 4.7 **Maintaining confidentiality**
- 4.7.1 Volunteers have access to a lot of information about Ongo, 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 Whilst volunteering with Ongo Homes, volunteers may become aware of confidential information about Ongo, its volunteers, customers, partners or employees. Volunteers will only have access to this kind of information in order to complete the duties of their role on behalf of Ongo and it should be kept confidential.
- 4.7.3 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, its staff, other volunteers, residents and stakeholders.
- 4.7.4 Any information or items shared by Ongo that are of a confidential nature must not be disclosed to anyone else apart from members of the group the information is intended for, 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.
- 4.7.5 Volunteers must not retain, copy or record information except in order to complete the duties of their volunteering role.
- 4.7.6 If volunteers have any doubt about whether information is confidential or not, then they should clarify with the Customer Engagement Manager or Head of Service.
- 4.7.7 Confidentiality must be respected and continued at all times and this agreement will continue after an individual ceases to be a volunteer with Ongo. Any information gained during their time as a volunteer should remain confidential and must not be shared with others.
- 4.7.8 Ongo will treat any breach of confidentiality seriously and this will result in the immediate termination of access to Ongo information, and the Volunteers Code of Conduct will be invoked.

4.7.9 All breaches of confidentiality may be subject to a civil prosecution for damages by a resident / tenant or their family, or criminal prosecution under the retained EU law version of the General Data Protection Regulations ((EU)2016/679) (“The UK GDPR) and the Data Protection Act 2018 (“The DPA”).

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 you are a volunteer on any of the Customer Engagement groups and you go on to 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 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 to the Customer Engagement Manager regardless of whether these are ‘spent’ or ‘unspent’. A risk assessment will then be carried out in relation to the individual to:
 - a) Ensure there is no risk posed to staff or customers
 - b) Ensure there are no issues that could potentially damage the reputation of Ongo or the customer engagement activity role
 - 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 assess whether the necessary support or adjustments can be facilitated to enable the individual to be involved in the volunteering role

- Seek remuneration only for legitimate, agreed-upon expenses incurred as part of their role in line with the Customer Engagement Expenses policy
- Where finances are relevant to their volunteering role:-
 - a) Ensure the Ongo Homes guidelines are followed (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 relevant training sessions are attended 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 can use the equipment for personal use and for the purpose that it was originally intended (e.g. use of laptop to record /promote activities relating to their volunteering role, in line with the Information, Security and Acceptable Use Policy).
- 4.10.2 Volunteers will report any theft of equipment (gifted or funded via Ongo or any other source due to their volunteering role) to the Police and to the Customer Engagement Team.
- 4.10.3 Social media is a great way to communicate and build new relationships and volunteers are encouraged to use it to benefit their volunteering role.
- 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 (on Ongo related volunteering accounts and on their personal social media accounts).
- 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, its staff, members of community groups, customer engagement structures or other 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, associated group or committee
- Exclude anyone from being involved without a valid reason in Ongo customer engagement social media groups, e.g. a TI group must accept all TIs that wish to join – 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 other volunteers, residents, Ongo 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;
- Must not behave in an abusive way towards other volunteers, residents, Ongo staff and partners (outside meetings or during meetings). For example:-
 - a) Initiating or spreading hurtful rumours
 - b) Swearing at someone (including using obscene language, name calling)
 - c) Using insulting behaviour (including 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 status (recognised nine protected characteristics of the Equality Act 2010).

4.12.2 Volunteers shall not discriminate on any of the above grounds against any other volunteers, residents, Ongo 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

(Fairness, Respect, Equality, Diversity, Inclusion and Engagement) to 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.
 - 4.12.6 All volunteers should regularly familiarise themselves with the respective terms of reference or constitution of the customer engagement 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 and online news sites.
 - 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 or 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 is 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, and are not likely to cause upset to other volunteers.

- 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 Volunteers 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 customer engagement group structures.
- 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 quietly join the meeting and not disrupt it 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 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 **Conduct outside of meetings**
- 4.16.1 It is not the intention of Ongo to interfere with volunteers' freedom to do as they wish in their own time. However, there could be circumstances where their external conduct impacts on the reputation for integrity of Ongo, its employees, tenants or volunteers.
- 4.16.2 Making or supporting derogatory comments about Ongo, its staff, customers or volunteers, or anyone else associated with Ongo, including on social or professional networking sites is inappropriate and will be considered a breach of this Code of Conduct. Care should be taken to avoid using language which could be deemed as offensive to others. .
- 4.17 **Process re Alleged Breaches to the Customer Engagement Volunteer Code of Conduct**
- 4.17.1 Ongo shall investigate alleged 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.
- 4.17.2 The Customer Engagement Manager (or HoS) will speak to the complainant to get a full picture of their complaint.
- 4.17.3 Will communicate to the individual that the complaint relates to, detailing the nature of the complaint received. Details will also be provided of the investigation process to be followed and the possible sanctions that could be imposed should the complaint investigation determine that a breach to the code of conduct has indeed occurred.

- 4.17.4 An offer will be made to the individual to attend a specific meeting (face to face or via the telephone) to respond to allegations made. Should this offer be refused, then the option to respond to the allegations in writing within a set time frame will be made. It will be made clear that should all offers be refused then the investigation will proceed, with an outcome decision being made based on the evidence available.
- 4.17.5 Following any meeting, a written statement of the meeting discussion will be shared with the individual concerned.
- 4.17.6 Any further investigation required will then take place.
- 4.17.7 Following completion of the investigation, all information will be considered and a decision will be taken as to whether a breach to the volunteer's code of conduct has occurred. If it is deemed that a breach has been made then a decision will be taken as to the relevant sanction required
- 4.17.8 The outcome of the investigation will be shared with the individual that the complaint relates to.
- 4.17.9 Information will be provided to the relevant customer engagement group that a code of conduct complaint has been investigated and that the findings:
- Didn't identify a breach, therefore no further action is required
 - Did identify a breach and that relevant sanctions have been imposed
- 4.17.10 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.

4.18 Outcomes of Breaches

- 4.18.1 We always make sure, for the outcomes of breaches, that the emphasis is on providing training, advice, support to ensure that the individual does not commit any further breach. However, sanctions will be dependent on the severity of the breach and could include any of the following:
- A verbal A written warning
 - A three month or six month suspension from all customer engagement volunteering activities with Ongo Homes
 - In extreme or repeat cases, a permanent exclusion from all customer engagement volunteering activities with Ongo Homes

- 4.18.2 At the end of any suspension period if the individual wishes to participate once again in a Customer Engagement structure, they must re-apply in writing to Ongo Homes for permission. The Customer Engagement Manager will give consideration as to whether any further conduct issues have occurred during the suspension period. If no further conduct issues have occurred, then the individual will be welcomed back as a volunteer but will be informed that they will be on a 6 month probationary period when they return.
- 4.18.3 If the volunteer breaches the Code again 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 volunteering in all Ongo Homes customer engagement activities.
- 4.18.4 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.
- 4.18.5 Volunteers should notify customer engagement if they are issued with a notice of legal action by Ongo Homes in relation to their tenancy.

4.19 **Right of Appeal**

- 4.19.1 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.
- 4.19.2 An Ongo Head of Service (or Director) will be appointed to hear 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.
- 5.4 New volunteers will be asked to sign up to the document and will be provided with a separate signature page (printed version or electronic) in order for them to be involved and become a member of a particular group(s). By doing so, this will show volunteers agree to abide by the information covered in the document and build strong relationships in partnership working between Ongo Homes staff, partners and volunteers.

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
- Separate signature sheet for the code of conduct

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

- 7.1 This Code of Conduct will be reviewed every 3-years unless anything changes that requires an earlier review.
- 7.2 Changes to the code shall be communicated in writing to all volunteers.