

Our Code of Conduct

2026

Foreword from the Chair of Great Places

I am pleased to introduce our customer-friendly version of the Great Places' updated Code of Conduct.

As a new Chair, I have had the opportunity to see first-hand the commitment that colleagues, Board members and involved customers bring to delivering high-quality homes and services. That commitment is built not only on what we do, but on how we do it. Our behaviours, values and decision-making are fundamental to maintaining the trust placed in us by our customers, colleagues, partners and communities.

This Code of Conduct reflects that commitment. It incorporates the latest National Housing Federation Code of Conduct 2026, which introduces a number of new expectations and reflects the increasing emphasis across the housing sector on professionalism, accountability, transparency and customer focus.

However at Great Places, we want our approach to go further than simply complying with requirements. Over the past year, we have been engaging with customers, colleagues and Board members as part of our Building Professional Excellence programme, which supports the Competence and Conduct Standard and our wider ambition to strengthen professionalism across the organisation. Through this work, we have listened carefully to what customers tell us matters most to them: being treated with respect, kept informed, listened to, involved in decisions and supported by knowledgeable and professional colleagues.

As a result, this document brings together three important strands of work.

- Firstly, it includes all of the headline principles contained within the NHF Code of Conduct 2026. (The full version is available online at <https://www.housing.org.uk/our-work/governance/code-of-conduct-2026/>)
- Secondly, it includes the feedback we have received from customers, highlighting the behaviours and standards of service that are most important to them.
- Finally it includes commentary on how we demonstrate that we meet the requirements of the Code, having carried out a new self-assessment against the 2026 version.

By combining these elements into a single document, we have created a simple easy-to-digest version of the Code which explains those key principles, the customer feedback as well as demonstrating how we know we are compliant with the Code.

This Code applies to everyone who represents Great Places. It helps ensure that we act with integrity, treat people fairly, make sound decisions and remain accountable for our actions. Most importantly, it reinforces our shared responsibility to put customers at the heart of everything we do.

I would like to thank everyone who has contributed to the development of this document, particularly our customers whose insight has helped shape its content. I encourage all colleagues, Board members and involved customers to take the time to understand the Code and the role each of us plays in upholding its principles.

Together, we can continue to build a culture of professionalism, openness and respect that enables Great Places to deliver on its purpose and ambitions, both now and in the future.

Cath Purdy

Chair of the Board

Great Places Housing Group

Part I: Acting in the best interests of residents and the housing association

We have a responsibility to carry out our roles in a way that supports the long-term interests of current and future residents and in line with the purposes and values of Great Places.

A: Meeting our Responsibilities:

We must act in good faith, putting aside personal gain and making decisions that support the long-term interests of residents as a whole and are in the best interests of the housing association.

At Great Places, we achieve this by supporting colleagues, Board members and involved residents to understand their responsibilities through comprehensive induction, mandatory training, Great Conversations and regular policy updates. Our values, operating culture and strategic objectives are embedded into day-to-day decision making so that people act in the long-term interests of customers and the organisation.

We use clear governance arrangements, safeguarding processes, equality impact considerations and performance management to help ensure decisions are fair, inclusive and focused on customer wellbeing. Where people need support to fulfil their responsibilities, guidance and management oversight are available.

B. Representing the Housing Association:

In representing Great Places in any capacity, including at external events, in dealings with outside bodies and on social media, we are ambassadors for Great Places and must uphold and promote its values, objectives and policies.

Everyone who represents Great Places is expected to act as an ambassador for the organisation. Our values, Reputation Strategy, Social Media Policy and colleague guidance help ensure communications are professional, respectful and consistent with our purpose.

We also provide training and support for relevant colleagues, Board members and leaders on media engagement and public communications, helping to protect our reputation and maintain trust with customers, partners and stakeholders.

Part II: Behaving with integrity

By integrity, we mean that we must act honestly, transparently and in line with the highest standards of ethical conduct. The reputation and good name of Great Places depends on compliance with this code, and with the laws, policies and procedures that it refers to.

C. Conflicts of Interest:

We must take all reasonable steps to make sure that no conflict arises, or could reasonably be perceived to arise, between our duties to Great Places and our personal interests, other duties and relationships.

At Great Places, conflicts of interest are actively managed through our Probity Policy, annual declarations and regular declarations at meetings. Contractor interests are also monitored through the procurement process. Board member interests – including those of independent committee members – are published and reviewed, while colleagues and involved residents are encouraged to declare any new or potential conflicts as soon as they arise.

Central registers and governance oversight help ensure decisions are made fairly, transparently and in the best interests of Great Places and our customers.

D. Bribery, Gifts and Hospitality:

In our role at Great Places, we must not allow gifts, hospitality or other benefits to influence, or be perceived to influence, our judgement or behaviour.

At Great Places, our Probity Policy sets clear expectations on gifts, hospitality, bribery and corruption. Any offers received must be declared in line with policy, and a Gifts and Hospitality Register is maintained and overseen through our governance arrangements.

Mandatory training, regular communications and strong internal controls help ensure colleagues and Board members understand how to identify, report and prevent inappropriate influence.

E. Funds, resources and personal benefit:

We must use Great Places' funds, resources and assets responsibly, transparently and only for proper purposes.

At Great Places, we have robust financial controls, delegated authorities and procurement arrangements to ensure money and resources are used responsibly and deliver value for customers. Significant expenditure and contracts are subject to scrutiny and oversight.

Expenses, purchasing and approval processes are clearly defined and regularly reviewed through internal audit and assurance activities, helping to protect organisational assets and maintain public trust.

F. Confidentiality:

We must handle information that is provided to us in our role responsibly and lawfully, balancing confidentiality, commercial sensitivity and legal obligations with openness, transparency and accountability

What matters to our customers is that colleagues maintain confidentiality of customer information, acting in a transparent manner and in line with legal frameworks and relevant internal policies and procedures.

At Great Places, we take confidentiality and data protection seriously. Mandatory training, clear policies and secure systems help colleagues understand how to handle personal and sensitive information appropriately.

Information sharing agreements, data processing arrangements and clear procedures for access requests support compliance with legal requirements while promoting openness and transparency where appropriate.

G. Working with residents:

We must act fairly and properly in our dealings with residents, including listening to their views and being accountable for our actions.

What matters to our customers is that colleagues:

- Listen carefully to concerns and provide time and space for our customers
- Collaborate with customers to agree solutions, and resolve issues promptly
- Explain clearly how issues are being addressed and what will happen next
- Always do our best to keep our promises
- Work with customers to achieve their potential, coaching rather than telling, and always maintaining professional boundaries
- Take responsibility for our decisions, actions, and communication

At Great Places, we ensure that customer voices help shape our services through consultation, scrutiny, complaints, surveys, our insight group, Our Voice and our Customer Committee. We encourage colleagues to listen carefully, explain decisions clearly and work with customers to find practical solutions.

Our “with not for” approach promotes independence, respect and partnership, ensuring customers are involved in decisions that affect them and receive fair, consistent treatment.

H. Reporting concerns:

We must report to the appropriate person within the organisation any reasonable suspicions we have about possible wrongdoing in line with this code or relevant Great Places policies and procedures.

At Great Places, we promote a culture where people feel able to speak up and raise concerns without fear of unfair treatment. Our Speak Up (Whistleblowing) Policy provides confidential reporting routes for colleagues, Board members and others.

Concerns relating to misconduct, fraud, safety or other risks are investigated appropriately, with oversight through governance and assurance processes to support accountability and continuous improvement.

Part III: Treating others fairly, with respect and empathy

The way in which people behave towards each other is fundamentally important to the experience of residents and staff of Great Places. Respectful, fair and empathetic behaviour is essential to building trust, maintaining effective relationships and supporting a healthy organisational culture.

I. Fairness, respect and empathy:

We must treat all others with fairness, respect and empathy, regardless of role, status or circumstances. We must recognise where we have power and authority in our role and use this in a way that is responsible and, where possible, empowers others

What matters to our customers is that colleagues:

- Treat every customer with courtesy and professionalism
- Communicate with respect, never forgetting the reason we are here, and working in partnership with our customers
- Value different views, and recognise that people's individual experiences shape what they need and expect
- Recognise and respect people's diverse needs, identities, and backgrounds by providing accessible information and services, adapting our approach, and offering choice so everyone can participate fully and fairly
- Actively challenge bias and unfair treatment to ensure inclusivity is visible and embedded across all our services

At Great Places, respect, fairness and inclusion are central to our culture. Our values, Dignity at Work Policy and Customer Experience Strategy set clear expectations about how colleagues should treat customers, colleagues and partners.

We invest in equality, diversity and inclusion initiatives, collect customer insight to tailor services and provide support that recognises different needs, backgrounds and lived experiences.

J. Professional relationships:

We must maintain constructive, professional relationships with each other, based on a sound understanding of our respective roles and responsibilities.

What matters to our customers is that, as an organisation and as individuals, we work to tackle social housing stigma in our communities and wider society

At Great Places, professional relationships are supported through our Probity Policy, governance framework and clear roles and responsibilities. We encourage constructive challenge, open discussion and respectful communication at all levels of the organisation.

Training, guidance and effective reporting arrangements help ensure decisions are based on evidence and professional judgement, while maintaining appropriate boundaries and accountability.

We tackle social housing stigma through promoting positive stories about our customers and communities, challenging stereotypes whenever we encounter them, using respectful and inclusive language, and ensuring customers have a strong voice in shaping services and decisions. We work with customers as partners, recognising their strengths, aspirations and contributions, and helping to create communities where everyone feels valued and respected.

Part IV: Taking responsibility for the impact of our actions

We have a responsibility while on Great Places' business to consider the immediate and longer-term impact of our actions and to be accountable for them.

K. Resident experience:

We must anticipate and take responsibility for the impact that our conduct, actions and decisions may have on residents.

What matters to our customers is that colleagues:

- Listen carefully, avoiding assumptions, and explaining things clearly in plain language
- Remain calm, fair, and focused on working with customers to find constructive solutions
- Understand that reaching out might not have been easy, listen without judgement, acknowledge our customers' experiences, and make sure they feel heard and understood.

At Great Places, we place customers at the heart of decision-making and encourage colleagues to consider the impact their actions and decisions may have on customers and communities.

Our Customer Experience Strategy promotes a “with not for” approach, ensuring customers are treated as partners and that services are designed around their needs, preferences and circumstances. Customer insight, feedback and profiling information are used to help us tailor services and remove barriers to access.

We are committed to being open and accountable in our interactions with customers. Colleagues are expected to explain decisions clearly, listen to customer views and respond constructively to feedback. We gather feedback through complaints, surveys, consultations, Our Voice, scrutiny activities and our Customer Committee, using this information to understand customer experiences and improve services.

Customer satisfaction measures, complaints and performance information are regularly reviewed by colleagues, the Customer Committee and Board to ensure we continue to learn and improve.

Furthermore this year our Customer Experience Masterclasses have been rolled out across the organisation to all colleagues, to help build the mindset, skills and behaviours needed to create a truly customer-centric culture.

L. Health, safety and wellbeing:

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

At Great Places, the health, safety and wellbeing of customers, colleagues and partners is a priority. We maintain comprehensive health and safety, safeguarding and lone-working arrangements, supported by reporting systems that encourage learning from incidents and near misses.

We also recognise the importance of wellbeing and provide practical support, training and resources to help create a safe and healthy working environment.

M. Environment and sustainability:

Within our role at Great Places, we must consider, and try to avoid or reduce, negative impacts on the environment and sustainability.

At Great Places, we are committed to reducing our environmental impact and supporting the transition to a more sustainable future. Environmental considerations are built into development, asset management and business planning activities.

Initiatives such as carbon literacy training, investment in energy efficiency improvements and support for lower-carbon travel help colleagues and the organisation make more sustainable choices.

N. Digital and data:

We must ensure that our use of digital systems, data and emerging technologies is responsible and protects residents, staff and Great Places itself from harm.

At Great Places, we use secure systems, clear policies and mandatory training to help protect customer and business information. Colleagues are expected to report suspected cyber security incidents, data breaches or digital risks promptly.

Our governance and data protection arrangements support the responsible use of technology, including emerging technologies, while maintaining transparency, accountability and customer trust. We have invested significantly in cyber security arrangements and these are regularly audited to ensure that we keep our customers data safe. Data Governance is also an important priority for Great Places, to support with good decision making based on accurate information.



Part V: Acting with diligence and care

The diligence and care with which roles are performed has a significant impact upon the quality of decision-making and services, and on the experience of residents and staff. This includes taking responsibility for our own performance and for meeting relevant professional standards.

O. Learning and development:

In partnership with Great Places, we must take responsibility for our own learning and development, regularly updating and refreshing our skills and knowledge.

What matters to our customers is that we:

- Make sure we keep our skills and knowledge up to date so that we can deliver effectively for our customers now and into the future, all taking individual responsibility for our own professional development and practice
- As a business, invest in our colleagues and services to make sure we keep getting better

At Great Places, we encourage everyone to take responsibility for their own learning and development. Colleagues, Board members and involved customers are supported through comprehensive induction programmes, mandatory training, access to learning resources and regular development conversations. Through our Great Conversations approach, people are encouraged to identify their development needs, discuss career aspirations and seek opportunities to build their skills and knowledge.

We invest in professional development through internal programmes, apprenticeships, qualifications, leadership development and external learning opportunities. We continue to support the professionalisation agenda through our Building Professional Excellence programme, helping colleagues develop the knowledge, skills and behaviours needed to deliver excellent services for customers now and in the future.

P. Acting with Care and Diligence:

We must act with care and diligence in making sure that we understand our role and its requirements, and that we are equipped to carry out our duties.

At Great Places, we expect colleagues, Board members and involved customers to understand their roles, responsibilities and the standards required of them. Comprehensive inductions, clear policies, delegated authority frameworks and ongoing training help people make informed decisions and identify when issues or risks need to be escalated.

Our governance and assurance arrangements encourage people to prepare thoroughly, make evidence-based decisions and take ownership of resolving issues when they arise. Through regular supervision, performance conversations, audit activity and Board oversight, we promote a culture where concerns are acted upon promptly and risks are managed effectively to protect customers and the organisation.

Q. Continuous Improvement:

We must support a culture of learning and continuous improvement through acting in an open and accountable manner, recognising mistakes and learning from feedback to help Great Places to continue to improve outcomes.

What matters to our customers is:

- **If something goes wrong, acknowledge it quickly and act promptly to put it right**
- **We treat complaints and feedback as opportunities to learn and improve**
- **We work with each other to reduce the chance of mistakes happening again.**
- **As managers, we take responsibility for the services our teams provide, and work to continuously improve our customer experience.**

At Great Places, we are committed to learning from feedback, performance information and customer experience to continuously improve our services. Feedback gathered through complaints, surveys, consultations, Our Voice, customer scrutiny activities and the Customer Committee is used to identify opportunities for improvement and shape future service delivery.

At Great Places, we believe that when things go wrong, the most important response is to listen, take responsibility and act. We use complaints, feedback, customer scrutiny, surveys and performance information as opportunities to learn and improve. Colleagues are encouraged to work together to identify the causes of issues, share lessons learned and make changes that reduce the likelihood of the same problems happening again. Managers have a particular responsibility for the quality of the services their teams provide and are expected to use customer insight and performance information to drive continuous improvement and deliver a better customer experience

We encourage a culture of openness, reflection and constructive challenge, where colleagues are supported to learn from both successes and mistakes. Performance measures, Tenant Satisfaction Measures, scrutiny reviews, audit findings and customer feedback are regularly considered by colleagues, senior leaders, the Customer Committee and the Board, helping us identify what is working well and where improvements are needed. We use this learning to strengthen services, improve customer outcomes and deliver on our commitment to continuous improvement.