Highland Council's Contractors Code of Conduct 2025

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1. Introduction

This Code of Conduct outlines the standards expected of all contractors working on behalf of Highland Council in domestic properties. It ensures that all work is carried out safely, respectfully, and to the highest professional standards, safeguarding the dignity and wellbeing of all tenants.

This Code supports Highland Council's duties under the UNCRC (Incorporation) (Scotland) Act 2024 to act compatibly with children's rights and to promote safe, healthy homes for children and young people.

The Conduct applies to all external contractors and subcontractors working on behalf of Highland Council. While some sections refer to tenants (e.g. access, safeguarding, or communication), these are included to ensure mutual understanding.

Contractors must comply with all relevant legislation, including health and safety, building regulations, data protection, and equalities law.

2. General Conduct

2.1 Professionalism

- Always behave in a polite, respectful, and considerate manner.
- Carry out all duties efficiently, diligently, and to the highest standard.
- Wear appropriate work clothing and always display your own company ID badge. Badges should be shown to tenants at the start of the job.
- Contractors must not smoke or vape inside the property or in close proximity to tenants' homes.
- Contractors must not use radios, music, or use any media on site.
- Contractors must not undertake any additional work unless authorised by the Council. This can be via telephone call with a Team Leader or Maintenance Officer.
- Contractors must not consume or be under the influence of alcohol, illegal drugs, or impairing substances while working on Council contracts.
- Contractors should respond to tenant concerns with a calm, respectful, and professional approach at all times. They are encouraged to listen actively, seek to resolve any issues constructively, and focus on maintaining a positive experience for the tenant. If a resolution cannot be reached on site, the contractor should politely withdraw from the property and promptly notify the Council for further support.

2.2 Communication

- Introduce yourself clearly at every visit.
- Explain the work to be undertaken, the likely timescales, and any potential disruption.
- Contractors must give a summary of the work undertaken before departure. If work is incomplete, the tenant must be informed of when and how follow-up work will occur.
- Communicate changes or delays promptly to tenants and the Council.
- If unable to attend an appointment, the contractor must notify the tenant and Highland Council immediately, with an explanation and revised appointment time. Repeated failure to notify will trigger a formal warning.

2.2.1 Contractor Communications

Contractors may from time to time wish to advise Highland Council of available capacity, resources, specialist skills, business capability or other matters relevant to service delivery. Strategic communications of this nature should be directed to the relevant Repairs Manager, Principal Repairs Officer, or other officer nominated by the Council for this purpose.

Operational communications relating to existing works orders, inspections, quotations, variations, certifications, invoicing queries and day-to-day service delivery should continue to be directed through the relevant operational officers and teams. Work may only be undertaken following formal instruction or authorisation by Highland Council.

2.2.2 Work Allocation Arrangements

Highland Council allocates work through a range of procurement and operational arrangements, including frameworks, contracts, approved contractor lists, quotation exercises, direct awards and emergency response arrangements.

Where a contractor is appointed under a specific framework, contract or managed arrangement, work allocation will be undertaken in accordance with the terms, procedures and requirements applicable to that arrangement.

Work allocation decisions may take account of operational requirements, available resources, contractor capability, geographical considerations, urgency, service priorities and performance.

Appointment to a framework, contract, approved contractor list or other arrangement does not guarantee any minimum volume or value of work unless expressly stated within the relevant contractual documentation. Contractors **must not** seek preferential treatment or attempt to improperly influence work allocation decisions.

2.3 Business Email Requirements

All subcontractors on the Trades Framework must provide a dedicated business email address for communication with the Council. Personal email accounts must not be used for operational, scheduling, or data-related correspondence.
Exceptions may be granted for sole traders where a business email is not reasonably available, and only with approved justification.

2.4 Appearance and Identification

- Maintain a clean, professional appearance.
- Always carry your company ID badge.

2.5 Repair-First Principle

Contractors must seek to **repair in preference to replace** where it is safe and practicable to do so and where the outcome will meet required standards. Replacement is appropriate only where:

a) the item is **beyond economical repair (BER)**; or
b) the required part is **obsolete/unavailable** within a reasonable timeframe; or
c) a repair would **not comply with statutory safety requirements** or the **manufacturer's guidance**.

Where replacement is proposed, contractors must record the rationale in Connect (or any future system) and obtain prior approval where required by the works order. Replacement component should be on a like for like basis (**or equivalent**). The rationale must include: a brief description of the fault, repair options considered, a cost/time comparison, and evidence of parts obsolescence/unavailability.

3. Respect for Tenants, Property, and Neighbours

3.1 Property and Neighbourhood Care

- Take all reasonable precautions to protect the tenant's property, furnishings, and belongings.
- Use dust sheets, protective coverings, and ensure tools and equipment do not cause damage.
- Reconnect all essential services at the end of each working day.
- Ensure all work-related devices are charged before conducting works – this is not the tenant's responsibility. If requiring the usage of the tenant's electricity, contractors must ask before using. Tenants have the right to refuse.
- Leave the work area clean and safe each day.
- Dispose of waste materials responsibly and minimise environmental impact wherever possible.

- Be respectful of neighbouring properties and avoid causing unnecessary noise, obstruction, or inconvenience.
- Before leaving, the contractor must conduct a visual check with the tenant to confirm the work area is clean and satisfactory. If the tenant is unavailable, photographs must be taken as evidence.

3.2 Cultural, Religious, and Personal Beliefs
Respect all religious or culturally significant objects within a property. Do not move or disturb such objects without seeking permission.

Example: If a client requests that you remove your shoes before entering a room for religious reasons, and doing so would compromise your safety, explain the issue respectfully and suggest alternatives (e.g., using clean shoe covers). If no agreement can be reached, contact the Team Leader before proceeding.

3.3 Privacy, Photography, and Confidentiality
- Adhere to the UK General Data Protection Regulation (GDPR).
- Respect the privacy of all tenants.
- Do not enter rooms or areas of the property without permission.
- Treat all personal information seen or heard during work as confidential.
- Never share tenants' information or circumstances without proper authority.
- Photography is permitted only where necessary for the Council's business purposes in connection with the works (e.g., evidencing condition and repair/replace decisions). Avoid capturing personal data or sensitive items; where unavoidable, blur or crop before uploading to Connect.
- Do not take photographs (Review **12.1 guidance** for acceptable photography) inside or outside properties for the purpose of uploading to social media – e.g., promoting business. Prior written consent from the Council and the owner(s) is necessary.
- Do not post any details of works, addresses, or tenants on social media.
- Breaches may result in removal from the contractors list.

3.4 Environmental Responsibility & Sustainability (All Works – Minimum Standard)
Contractors must minimise environmental impact from their activities using best practicable means proportionate to the job.

Waste Management
Contractors must:

a) Prevent waste where reasonably practicable (right materials, right quantity; avoid unnecessary replacement).
b) Segregate waste wherever practicable (e.g., separating packaging, metal, timber, inert/rubble) and avoid contaminating recyclable waste streams.

c) Dispose of waste responsibly and provide waste documentation (e.g., waste transfer notes/receipts) to the Council on request.
d) Under no circumstances burn waste or other materials on site.

Vehicle & Plant Idling
Vehicle and plant engines must be switched off at standstill unless the engine is required for safe operation (e.g., equipment actively in use) or switching off would create an unsafe condition to avoid unnecessary idling.

Pollution Prevention and Housekeeping
Contractors must take reasonable steps to prevent pollution from dust, debris, spills, fumes and waste, including keeping common areas, footways, and access routes free from avoidable debris.

Single-Use Plastics
In alignment with the **Environmental Protection (Single-use Plastic Products) (Scotland) Regulations 2021** and the Council's sustainability goals, the Contractor must not leave behind any banned single-use plastic items (such as plastic cutlery, stirrers, or expanded polystyrene cups/containers) within the boundaries of any Council property or tenant home.

4. Health, Safety, and Welfare

Employers have a legal duty to protect your health, safety, and welfare, whether you work for Highland Council or as a contractor. The Housing Service does not accept any form of violence or aggression toward staff and will take all reasonable steps to prevent or reduce these risks. Members of the public are expected to treat staff with courtesy and respect.

Clear guidance is now in place for dealing with aggressive or violent behaviour in Council tenancies or temporary homeless accommodation. To support staff safety, **"markers" will appear on work orders**.

Safety Markers

The following codes may appear on work orders or address lists:

- **2TA** – Two officers to attend (one may be female)
- **NFO** – No female officers to attend

Only the codes will appear, so staff must know what they mean and follow them. If you have questions about a specific work order or address, contact your area Maintenance Officer.

4.1 General Site Safety

- Contractors must comply with the Health and Safety at Work Act 1974 and all associated regulations, including (**but not limited to**): the Work at Height Regulations 2005, Control of Substances Hazardous to Health (COSHH) 2002, CDM 2015, PUWER 1998, PPE Regulations 1992, and RIDDOR 2013.
- Carry out a risk assessment before starting any job.
- For complex work, Highland Council may require method statements for risk assessments.

Example: Before starting, identify and mitigate risks like: loose carpets, trailing cables, or uneven floors.

- Wear appropriate Personal Protective Equipment (PPE).

Example: Use dust masks when sanding, gloves for handling sharp materials, and hard hats where there is a risk of falling objects.

- Maintain a safe and tidy work environment.

Example: Keep pathways and doorways free from tools, cables, and debris to avoid trips and accidents.

- Report accidents, incidents, or near misses immediately.

Example: If a tenant trips over your equipment, even if they appear unhurt, it must be reported immediately.

4.2 Principal Contractor

- A Principal Contractor must be appointed where multiple trades or subcontractors are engaged on site at the same time.
- The Principal Contractor is responsible for planning, managing, monitoring, and coordinating health and safety during the construction phase.
- They must ensure that all contractors comply with their duties under **CDM 2015** and that work is carried out without risks to health and safety.
- A **Construction Phase Plan** must be developed and implemented before works commence.
- The site must be appropriately secured, with safe access and welfare facilities in place for all operatives.
- The Principal Contractor must liaise regularly with the Council, Principal Designer, and any other relevant parties to review site safety.
- All incidents, near misses, and safety concerns must be recorded and reported to the Council immediately.

- Expectation to provide price consistency with market standard: “How would you assure best value of money for Highland Council”.

Note: The role of Principal Contractor may also be undertaken by the Council where appropriate.

4.3 Working at Height

- Do not work at height in adverse weather conditions (and as per your risk assessment).
- Ensure all ladders and scaffolding meet safety standards.

Example: Only use certified ladders and scaffolding and never improvise with furniture or other objects.

4.4 Lone Working and Minors

- Do not be left alone with children under the age of 16.
- Do not enter the tenant’s home when nobody is there.
- Cease work and contact the Team Leader or the Maintenance Officer if adult tenants leave the property.
- However, in some cases, a tenant representative may be present in the property on behalf of the tenant. Contractors must verify this arrangement with the Maintenance Officer before proceeding.
- If any individual discloses a concern or if a contractor observes signs of abuse, harm, or risk, this must be reported immediately to Highland Council in accordance with the Council’s safeguarding procedures.

4.5 Tenant Vulnerabilities

- Be considerate and understanding to the different needs and vulnerabilities that tenants may have, including both seen and unseen disabilities or additional support needs.
- Communicate clearly and maintain safe work areas.
- Some tenants are recognised as having communication difficulties (i.e. language barriers, disabilities). In such cases, we will make arrangement such as hiring an interpreter.

4.6 Asbestos Management

Contractors must comply with all relevant legislation and guidance on the identification, handling, and removal of asbestos-containing materials (ACMs), including the Control of Asbestos Regulations 2012.

- **Before commencing invasive works**, contractors must ensure that the Council has provided the most up-to-date asbestos survey for the property (including communal areas).
- **If suspected asbestos is encountered**, work must stop immediately. The area must be made safe, and the Maintenance Officer notified without delay.

- Contractors **must not attempt to remove or disturb** any material suspected to contain asbestos unless specifically licensed and authorised to do so.
- All operatives must have received appropriate **asbestos awareness training**.
- Any breach of asbestos protocol will be treated as a serious health and safety incident and may result in removal from the contractor list.

5. Access and Appointments

5.1 Arranging Access

- Agree appointments in advance.
- Confirm date and time in writing or by phone. If there is a mobile number available, then contractors must phone tenant to make appointment.
- However, Emergency Maintenance Engineers (EMEs) may attend without a prior appointment where emergency response is required.
- If a contractor cannot attend a scheduled appointment, they must notify both the tenant and Highland Council immediately. Failure to do so more than once in any six-month period will trigger a formal review and may affect future work allocation.

5.2 Missed Appointments and Tenant Responsibilities

- Leave a calling card with your name, contact number, and time of visit if access is not possible.
- Report repeated access issues to the Council immediately.
- Tenants should ensure that work areas are clear of furniture and belongings before work begins. If assistance is required, contractors may help move items but cannot accept responsibility for accidental damage.
- Tenants must not leave keys hidden or with others for contractors to access properties unattended.
- Must take photo of front door, with data/time stamp to show that appointment was attended at expected time.

6. Equality, Diversity, and Inclusion

- Treat all individuals fairly and with respect, regardless of race, ethnicity, gender, age, disability, sexual orientation, religion, or belief.
- Make reasonable adjustments for Tenants' needs.

7. Insurance and Accreditation

- Contractors must maintain appropriate public liability and employer’s liability insurance.

- Contractors must be **SSIP** accredited or equivalent, for example with: **the Contractors Health and Safety Assessment Scheme (CHAS).**
- All relevant accreditations and certifications must be kept up to date and available upon request.

8. Responsibility for Subcontractors

Principal Contractors are fully responsible for the actions and performance of any subcontractors they employ.

- All subcontractors must be aware of, and comply with, the requirements of this Code of Conduct and all applicable Highland Council policies.
- It is the Principal Contractor's responsibility to ensure subcontractors have appropriate training, accreditations, and insurance.
- Any breaches of conduct, health and safety, or quality standards by subcontractors will be treated as a breach by the Principal Contractor.
- Highland Council reserves the right to request the removal of any subcontractor who fails to meet expected standards.
- Subcontractor performance will be monitored as part of the overall contractor evaluation process.
- Recognising the geographic scale and rural nature of the Highland Council area, contractors may utilise local subcontractors to support service delivery. In all cases, the main contractor remains fully responsible for their conduct and compliance with this Code of Conduct.

9. Performance Monitoring and Compliance

9.1 Monitoring Procedures

Contractor performance will be monitored through:

- Tenant satisfaction surveys and complaint resolution outcomes
- Random and targeted post-inspections of works
- System checks of Connect job notifications and photographic uploads
- Analysis of adherence to timescales and invoicing deadlines
- Review of repair-vs-replace rationales recorded in Connect.

The Council will administer tenant satisfaction surveys upon completion of a Works Order to gather feedback on the service received. All validated survey results and complaints will be recorded and analysed by the Council, and these results shall form the basis of a Contractor's performance review.

9.2 Key Performance Indicators (KPIs)

Contractors are expected to meet the following minimum standards:

Category	Target Timeframe
Emergency Make Safe Response	Attendance within 2 hours (from notification)
Emergency Repairs	Within or better than 12 Hours
High Priority Repairs	Within or better than 3 Days
Routine Repairs	Completion within 8 working days
Void Property Works	Completion with agreed turnaround schedule
Minor Repairs	Within or better than 3 months
Upload of Before & After Job Photos	Within or better than 48 hours of job completion
Repair-vs-Replace Documentation	100% of replacement decisions supported by a Connect rationale entry and evidential photos within 48 hours of completion.
Invoicing	Within or better 14 days of completion date
Responses to Council queries	Within or better 2 working days

Repeated failure to meet KPIs, including the repair-vs-replace KPIs, will affect future work allocations and may result in suspension from the contractor framework.

9.3 Use of EME Work Orders

Emergency Maintenance Engineers (EMEs) are authorised to carry out **make-safe works only**. Contractors must not use the original EME work order number to undertake follow-on or permanent repairs.

- All follow-up works must be raised via a **new day-to-day works order** from Highland Council.
- Failure to follow this process may result in **non-payment** for unauthorised works and may be treated as a serious breach of this Code.

9.4 Compensation for Tenant Damage

Where damage is caused to a tenant's property by a contractor or their employees, the contractor will be expected to:

- Engage directly with the tenant to resolve and settle any reasonable compensation claims;
- Communicate in a timely and respectful manner;
- Cooperate in good faith with Highland Council Staff.

If a resolution is not achieved, the Council reserves the right to set reasonable recovery costs directly from the contractor on the tenant's behalf.

9.5 Response to Council Requests

Contractors must respond promptly and professionally to all formal communication from Highland Council. This includes, but is not limited to, correspondence relating to:

- Tenant complaints
- Health and Safety
- Requests for inspection or follow-up
- Invoicing queries or performance audits

Delayed or ignored responses may result in financial penalties or escalation to senior management.

10. Complaints Resolution

Highland Council is committed to ensuring that all complaints raised by tenants, staff, contractors or members of the public are handled promptly, fairly, and professionally. Contractors play a key role in early resolution and must adhere to the following requirements.

10.1 Immediate Action and Investigation

If any person makes a complaint concerning the services delivered, the contractor must:

- Acknowledge the concern respectfully and professionally.
- Immediately investigate the complaint.
- Take appropriate corrective action without delay.
- Notify Highland Council of both the complaint and the actions taken.

Contractors must adopt a problem-solving approach, prioritising resolution at the earliest possible opportunity.

10.2 Complaint Priority Levels and Timeliness

Timelines are determined by the nature and severity of the complaint. Contractors must meet or exceed the following maximum resolution timescales:

Complaint Type	Definition	Required Response & Resolution
Emergency Complaints	Any complaint relating to risk to health, safety, security, or severe service failure.	Same-day response and resolution.
Frontline Complaints	Straightforward issues that can be resolved quickly and do not require a detailed investigation.	Respond and resolve within **5 working days**.
Complex Investigation Complaints	Cases that require detailed investigation, multiple parties, or technical assessment.	Respond and resolve within **20 working days**.

These timeframes represent the maximum acceptable duration; contractors should aim to resolve all complaints as promptly as possible.

10.3 Communication Requirements

Contractors must:

- Maintain clear, respectful communication.
- Provide updates if investigations require more time (within allowable timescales).
- Inform Highland Council of any delays, findings, or required Council actions.
- Provide factual, complete, and timely information when inquiries are made by Council staff.

10.4 Escalation

If the contractor cannot resolve a complaint within the required timescales—or if the complaint concerns contractor conduct, safeguarding, or serious service failure—it must be escalated immediately to the designated Highland Council representative (e.g., Maintenance Officer or Team Leader).

Failure to escalate appropriately may result in performance reviews, formal warnings, or suspension from future work allocations.

10.5 Record Keeping

Contractors must retain accurate records of:

- The complaint received
- Actions taken
- Timelines
- Final resolution

These records may be used in performance reviews, audits, or investigations. Persistent or repeated complaints relating to attitude, behaviour, or poor workmanship may result in suspension from the contractor framework. All records must be kept in line with GDPR.

11. Dispute Resolution

- Handle minor disputes courteously onsite.
- Contractors must cooperate fully with Council investigations.
- Understand that Highland Council's decision is final after investigation, subject to any appeals process set out elsewhere in this Code.
- If no resolution can be agreed between the tenant and contractor, escalate the matter to the designated Highland Council representative (e.g. Maintenance Officer or Principal Repairs Officer).
- Contractors who receive repeated complaints about attitude, cleanliness, or non-compliance may be suspended pending investigation. Disciplinary action will consider both the volume and severity of tenant-reported incidents.

12. Site Safety Signage and Safeguarding

- Contractors must ensure that any potentially hazardous areas, including open hatches, exposed scaffolding, or incomplete flooring, are clearly cordoned off and appropriately signed.
- Warning signage must be visible and compliant with health and safety standards.
- Hazardous building materials such as asbestos or lead-based substances must be managed in strict accordance with legislation.
- All tools, materials, and equipment must be stored securely to prevent harm to residents, children, or visitors.
- Remain vigilant for signs of abuse, neglect, or any safeguarding concerns involving children or vulnerable adults.
- If a contractor suspects abuse or harm, they must report their concerns immediately to the Council for child/adult protection.
- Contractors must not leave dangerous areas unattended without appropriate barriers or warnings in place.
- Clear evidence of hoarding and/or property damage must be reported.
- All safeguarding incidents or concerns must be reported immediately to Highland Council in accordance with Council procedures.

12.1. Incidents, Safeguarding and Duty to Cooperate

Where any safeguarding concern, serious incident, allegation, or event occurs in connection with works carried out on behalf of Highland Council, the contractor and any subcontractor must immediately report the matter in accordance with Council procedures.

For the purposes of this Code, this includes (but is not limited to):

- Suspected or actual abuse or neglect involving children or vulnerable adults.
- Incidents involving self-harm, suicide attempts, or serious risk to life.
- Serious accidents, injuries, or deaths within a property.
- Any incident requiring attendance or involvement from emergency services.

Contractors must cooperate fully and without delay with Highland Council and any relevant external organisation or authority involved in the response or investigation. This may include, where appropriate, Police Scotland, the Scottish Ambulance Service, NHS services, social work, child or adult protection services, regulatory bodies, or any other relevant agency.

This duty of cooperation includes:

- Providing prompt, accurate, and factual accounts of events.
- Providing written statements where reasonably required or when asked.
- Making relevant personnel available for interview or follow-up.
- Preserving relevant records, photographs, and job information.
- Complying with any instruction to withdraw staff from site or suspend attendance.

Contractors must not take any action that could obstruct, delay, or prejudice an investigation.

Failure to report a relevant incident, or failure to cooperate fully with Highland Council or external agencies, will be treated as a serious breach of this Code and may result in immediate removal from site, suspension from works, removal from the framework, and referral to the appropriate authorities.

13. Working Hours & Noise

Contractors must plan and undertake works using Best Practicable Means to minimise noise and dust impacts.

13.1. Standard Working Hours

Work parameters:

• Monday to Friday: 08:00–18:00
• Saturday: Pre-authorised work & working times by the Council required.
• Sunday / Public Holidays: Pre-authorised work & working times by the Council required. No noisy works.

"Noisy works" include drilling, chasing, hammering/breaking, powered cutting/grinding, and operation of noisy plant.

13.2. Emergency Exception (Make-Safe / Essential Services)

Emergency works required to make safe, restore essential services, or prevent serious property damage may take place outwith the above hours only. This does not permit routine follow-on works out of hours.

13.3. Dust Control

Contractors must use proportionate dust suppression and housekeeping controls (e.g., local extraction where appropriate, damp-down, dust-sheeting, and clean-up) to prevent unnecessary spread of dust to the home, common areas, and neighbouring properties.

13.4. Planned High-Impact Works (Notification Requirement)

Where works are planned to involve high-noise activities (e.g., percussive breaking, structural drilling) contractors must provide advance notice to the tenant and, where reasonably practicable, neighbouring properties likely to be directly affected. The notice must include the expected dates/times and a contact number for the contractor.

14. Completion of Work and Invoicing Arrangements

14.1. Notification of Job Start and Completion

Contractors must notify Highland Council when they **start** and **complete** a job. This notification should be made using the Council's designated system – Connect, where available.

These notifications are mandatory and enable:

- Spot checks to ensure compliance with health and safety and the Customer Code of Conduct
- Verification that works are being undertaken as instructed
- Inspection of quality and workmanship before departure from site

This requirement reflects the standard expected of internal Council trades teams and forms part of the Council's value-for-money assurance process.

14.2. Image Documentation Requirement

Contractors must upload **photographic evidence** to the Connect subcontractor portal at the following stages:

- Prior to taking photographs, contractors/subcontractors must explain to tenants why they are taking photographs.
- After taking the photographs, the contractor must show tenant to ensure they are happy nothing personal is included in the image.
- Upload images of the area(s) to be worked on.
- Upload images showing completed works.
- For **all reactive component replacement decisions over the £500 threshold**, contractors should contact The Council for authorisation. Contractors must then upload clear, labelled, **time-stamped photographs** evidencing the defect/condition necessitating replacement (e.g., failed components, corrosion, cracks), plus **model/serial labels** and any manufacturer safety labels.
- Where the decision is based on obsolescence/item unavailability, attach a **screenshot or document** from supplier/manufacturer demonstrating this.
- These images must be uploaded **via the Connect photo-upload facility** before invoice submission. Work involving replacement without this evidence may be rejected for payment and may attract performance penalties.

All images must be:

- **Clear**, labelled, and time-stamped
- Uploaded within **48 hours** of completion
- Properly linked to the associated works order
- Deleted from devices once uploaded.

Failure to comply may result in:

- Invoicing delays
- Contractor performance penalties
- Suspension from further work allocations

14.3. Invoicing Requirements

All works must be completed to a professional standard. Contractors should inform residents when the job is complete and leave the area clean and safe.

Invoices must be submitted and relevant associated documentation (e.g., certifications & service records) to Connect system **within 14 days** of the target completion date and must include:

- A unique invoice number.
- Your company name, address and contact information.

- The name of the customer being invoiced (The Highland Council) and the relevant depot address.
- The original works order or equivalent reference.
- A clear description of the works and what you are charging for. Include: full cost breakdown (labour, plant, materials, and mark-up, if applicable).
- Date and time of works completion.
- Details of any variation from the original specification.
- Date of the invoice.
- The amount(s) being charged.
- VAT if applicable.
- The total amount.

The Council aims to make payment within **30 days** of receiving a complete and accurate invoice. Late or incorrect submissions may delay processing.

15. Conflict of Interest

- Contractors must declare any personal or professional relationship that may present a conflict of interest in the delivery of works. This includes, but is not limited to:
  1. Carrying out work at the homes of relatives.
  2. Any situation where the contractor may receive personal benefit or preferential treatment.
- Such situations must be declared in advance to the issuing officer.
- The Council reserves the right to reassign work or refuse payment if a conflict is not disclosed.
- Failure to declare a conflict of interest may result in removal from the approved contractor list and could lead to further investigation.

16. Callout and Emergency Reporting

This section applies to all contractors responding to emergency, out-of-hours, or urgent maintenance callouts on behalf of Highland Council. Contractors must report all callout details, including actions taken and times attended, for the preceding period to the local Building Maintenance (BM) team. This is typically the Valuations Officer for the area. Process as follows:

- **Submission Deadline:** All callout reports must be submitted via email to the local Building Maintenance team by 9:00 a.m. each working day for the previous 24-hour period.
- **Required Information:**
  a) Property address
  b) Date and time of the callout

c) Nature and details of the issue attended
d) Actions taken during the visit
e) If follow-up work is required, full information must be included to enable a day-to-day works order to be raised correctly.

Example: If an emergency plumber attends due to a burst pipe and finds additional internal water damage, they must note this and include all necessary follow-up details to allow repair works to be instructed.

Failure to provide accurate and timely reports may result in delays to works progressing and will be considered in contractor performance reviews. Reports that lack critical details may be returned for revision.

17. Compliance, Monitoring and Penalty Matrix

17.1. Framework of Enforcement

All contractors, subcontractors, and their personnel operating on behalf of The Highland Council must strictly adhere to this Code of Conduct. Compliance is monitored dynamically by designated Council officers. All breaches and actions taken will be recorded and may be considered in contractor performance monitoring and future work allocation decisions.

Failure to uphold these standards will trigger immediate enforcement via the tiered penalty matrix below.

Repeated or persistent minor breaches may be escalated to a higher tier where they indicate a pattern of non-compliance or poor conduct.

17.2. Penalty Matrix

The following Penalty Matrix sets out the enforcement framework to be applied where contractors fail to comply with this Code of Conduct. All breaches will be assessed and managed in accordance with this matrix. Sanctions may apply to individual operatives and/or the contractor organisation.

For the purposes of this matrix, an “offence” includes any breach identified through inspection, complaint, or Council officer observation.

Highland Council reserves the right to apply any level of the Penalty Matrix, including immediate escalation to Tier 3, where the severity of the breach warrants such action.

Violation Severity	Examples of Infractions	1st Offence	2nd Offence	3rd Offence
Tier 1: Minor (Service & Conduct)	• Playing loud radios without consent. • Failing to display clear ID badges. • Parking on grass verges or obstructing tenant access. • Leaving minor debris on-site overnight.	**Verbal Warning** Mandatory correction of the issue within 2 hours.	**Written Censure** Formal notice to Contractor.	**Escalation** Infraction reclassified as a Tier 2 Serious Breach.
Tier 2: Serious (Safety & Operational)	• Leaving unattended tools in occupied spaces / schools. • Failure to use dust sheets or clear daily waste. • Breaching localised urban/rural noise thresholds. • Failure to comply with a reasonable instruction from Highland Council staff.	**Formal Warning** Immediate work-stop on the specific task.	**Operational Freeze** Removal of the operative from site and prohibition from undertaking any further works at that address.	**Procurement** Formal escalation to Procurement and Senior Management – may result in suspension from framework.
Tier 3: Gross (Safeguarding, Legal & Critical Risk)	• Unauthorised/unsupervised contact with children or vulnerable adults. • Breaches of the UNCRC (Incorporation) (Scotland) Act. • Critical Health & Safety failures putting life at risk. • Major unmitigated environmental or chemical spills. • Failure to cooperate with Police Scotland or other agencies. • Failure to report a safeguarding incident immediately.	**Investigation** Immediate removal of the operative from site and potential referral to relevant authorities.	**Suspension from Works** Immediate suspension from all current and future work allocations pending investigation and senior management review.	**Removal from Framework** Permanent exclusion from the Highland Council Trades Framework.

17.3. Appeals Against Penalties

A contractor may formally appeal a Tier 2 or Tier 3 penalty by lodging a written appeal to the Principal Repairs Officer within five (5) working days of receiving the penalty notice.

Works must continue during the appeal period unless otherwise instructed by Highland Council. Contractors must not withhold labour, delay site progress, or otherwise disrupt service delivery as a result of an appeal. Failure to comply may result in further escalation under the Penalty Matrix.

18. Useful Contact Remits

- Maintenance Officer (Work Queries)

- Team Leaders (Work Queries)
- Servicing & Contracts Team (Queries)
- Senior Maintenance Officer (Escalations)
- Principal Repairs Officer (Escalations)
- Valuations Officers (Invoice and Housing Requirements Queries) - Contractors should report all callout details, including actions and timings, from the preceding period to the local building maintenance team (usually the Valuations Officer).

19. Appendix: Highland Council Contractor Compliance Checklist □

This checklist is a helpful tool for day-to-day use by contractors and trades staff when carrying out work in Highland Council homes. It is a brief guide and does not replace the full Code of Conduct or Health & Safety obligations – it focusses on key aspects.

1. Job Details

Job number / works order reference: _____
Property address: _____
Date: _____
Time: _____
Contractor / company name: _____
Operative name(s): _____

2. Before Travelling / On the Way

- ☐ I have read and understood the works order, including any special instructions.
- ☐ I have my ID badge and company uniform / branded workwear.
- ☐ My PPE is available, in good condition and appropriate for today's tasks.
- ☐ My tools and equipment are safe and suitable for use (pre-use checks carried out).
- ☐ I have checked the latest asbestos information for this property, where applicable.
- ☐ Where needed, I have made reasonable arrangements for any known communication or access needs (e.g. interpreter, additional time).
- ☐ Where required, the appointment time and nature of works have been agreed with the tenant in advance.

3. On Arrival at the Property

- ☐ I introduced myself clearly, showed my ID badge and explained what work I am here to do.
- ☐ I have checked that an adult tenant or agreed representative is present before entering.
- ☐ I am not left alone in the property with any child under 16.
- ☐ I have asked permission before using any of the tenant's electricity (if required) and accepted their right to refuse.
- ☐ I have respected the tenant's home, culture and privacy (e.g. knock and wait, shoe coverings where appropriate).
- ☐ I have identified any immediate safety risks (e.g. trip hazards, unsafe floors, blocked exits) and taken steps to control them.
- ☐ I have ensured neighbours and communal areas are not unreasonably obstructed or disturbed (parking, materials, noise).

4. During the Work – Safety and Behaviour

- ☐ I am not smoking or vaping in or near the property and I am not playing music, radios or loud media on site.
- ☐ I am keeping the work area as clean and tidy as reasonably possible, with clear walkways free from avoidable trip hazards.
- ☐ Any ladders, steps or access equipment I use are suitable, inspected and used safely in line with my training.
- ☐ If I encounter suspected asbestos or another serious hazard, I will stop work, make the area safe and contact Highland Council immediately.
- ☐ I am taking reasonable care of the tenant's belongings (e.g. using dust sheets, protecting surfaces).
- ☐ I have not agreed to any additional or different work with the tenant without approval from Highland Council.
- ☐ If the adult tenant leaves and no representative is present, I will stop work and contact the Maintenance Officer / Team Leader for advice.

- ☐ I remain alert to any safeguarding concerns about children or vulnerable adults and know how to report these to Highland Council.

5. Photographs and Information

- ☐ I only take photographs where they are needed for Highland Council's records (e.g. fault, completed work, meter readings).
- ☐ I have explained to the tenant why photographs are required and shown them the images if requested.
- ☐ I avoid capturing unnecessary personal items or people in photographs wherever possible.
- ☐ I do not use any photographs or job information for social media or promotional purposes.
- ☐ Once photographs are uploaded and linked to the works order, I will delete them from my device in line with data protection requirements.

6. Before Leaving the Property

- ☐ The work area has been left clean, tidy and free from tools, materials and debris.
- ☐ Essential services (e.g. power, water, heating) have been reconnected or the tenant has been clearly advised of any planned disconnections.
- ☐ I have carried out a final visual check with the tenant, where possible, and noted any concerns raised.
- ☐ I have clearly explained what work has been completed and any follow-on work or appointments that may be required.
- ☐ If any accidental damage occurred to the tenant's belongings or property, I have explained this and notified Highland Council so it can be recorded.

7. Invoicing and Follow-up

- ☐ My records for this job (times, materials, description of work) are accurate and complete for invoicing purposes.
- ☐ I will submit any invoice or returns for this job within the timescales required by Highland Council.
- ☐ Any issues that may affect future safety, access or work (e.g. hoarding, serious disrepair, repeated no access) have been reported to Highland Council.