

Code of Conduct

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Scope

1. The Code of Conduct (the 'Code') applies to all employees and other workers (including casual workers, agency workers and consultants)¹ and their conduct both within the organisation and when dealing with other organisations as a representative of the City of London Corporation. For ease of reference the term "employees and / or other workers" will be used unless otherwise stated as applying only to employees or specified other workers.
2. Where there are additional requirements in the policy applicable to Chief Officers and senior managers at grades I and J (including any other employees and other workers with the same level of seniority); for ease of reference the term "Senior Management" will be used, unless it is stated as applying only to part of this group.
3. As far as possible, employees must also comply with the Code if they are appointed as a representative of the City Corporation in any organisation, trust or company in addition to the requirements of such bodies.
4. The principles detailed below set common standards for all employees and other workers, but individual Chief Officers may wish to issue further guidance specifically relating to their departmental service requirements, which will supplement but not contradict the principles contained in this Code.
5. The Code does not affect an employee's and other worker's rights and responsibilities under the law. These principles should be taken in conjunction with requirements set down by any employees or other worker's professional bodies obligations.
6. The Code cannot cover every eventuality and if in any doubt or any additional guidance is required, employees and other workers should consult their line manager, who may seek advice as necessary from Corporate HR or their HR contact.

Standards

7. Employees and other workers are expected to give the highest possible standard of service to the public, service users, Members, management and colleagues; and where it is part of their duties to provide advice to Members, management and colleagues to do so with impartiality and in good faith.
8. This will be achieved in part through the demonstration of effective and appropriate behaviours defined internally, and adherence to the Principles of Public Life i.e. selflessness, objectivity, accountability, openness, leadership, honesty and integrity in which the public, Members, or managers can trust. Employees and other workers are expected to conduct themselves with the reasonably held belief that the City Corporation is

¹ Where stated, parts of the Code relate to external volunteers.

not likely to fundamentally undermine the required relationship of trust and confidence between themselves and the organisation.

9. There is an implied duty in employment and casual worker contracts to serve the employer with good faith and fidelity i.e. the duty: not to disrupt the employer's business, not to compete, not to solicit customers, not to entice employees, not to misuse the employer's property; and the duty: of confidentiality and to account, and to disclose wrongdoings; the duty to: obey lawful and reasonable instructions, to be adaptable and to exercise reasonable care and skill. Equivalent provisions will be included in contracts with other workers.
10. Employees and other workers must immediately inform their line manager in writing if, during their City Corporation employment / engagement circumstances arise (during or outside of working hours) that could reasonably be expected to impact on their capability, capacity and / or suitability to carry out the duties and responsibilities of their role.
11. Employees and other workers must not conduct themselves in a way that brings or could bring the City Corporation, Members, service users, partners and colleagues into disrepute or cause reputational damage; so that it is likely to destroy or seriously damage the relationship of trust and confidence between them.
12. All employees and other workers should refer any press or media enquiries directly to the Media Team, without engagement. Any article, publication or interview given on City Corporation policy or activity must be properly authorised by the Director of Communications or Head of Media.
13. To ensure compliance with the Code of Conduct, employees and other workers should periodically familiarise themselves with the latest version and any documents referred to therein. Employees and other workers should also have read and understood the conditions under which they are engaged, including all local policies, which take into account all legislation and any local and national schemes where applicable. This Code and corporate employment policies are contained within the Employee Handbook.
14. Any substantive contravention of this Code may result in disciplinary proceedings, and those disciplinary proceedings may result in dismissal. For other workers not falling within the scope of disciplinary procedures appropriate action will be taken. In addition, certain cases such as those involving bribery, corruption or fraud may also be referred to the Police and subject to a criminal investigation. Where the offence involves financial irregularities then the City Corporation will aim to recover its assets.
15. Employees and other workers shall not during or at any time after their employment / engagement with the City Corporation ending (except in the proper course of their duties or unless required by law), disclose or otherwise make use of any confidential information relating to the City Corporation's business, strategy, policies or finances, including personal information relating to service users, Members or employees or other workers. (See Disclosure of Information below).
16. Employees and other workers will be expected, through agreed procedures and without fear of recrimination, to bring to the attention of the appropriate level of management

potential deficiencies in the provision of service. Employees and other workers must report impropriety or any material breaches of procedure to the appropriate manager. The Whistleblowing Policy is also available to employees who feel they need to raise an issue outside of the management chain.

17. The Director of Human Resources will be responsible for the interpretation, advice and management of this Code on behalf of the City Corporation.

Conflicts of Interest

18. All City Corporation employees and other workers must remain beyond suspicion and ensure that they are not placed in a position that risks, or appears to risk, conflict between their private interests and their City Corporation duties.
19. The Conflicts of Interests Policy sets out the process to report the type of incidents which may give rise to conflicts of interest including for example: relationships, personal interests, secondary employment or running a business, outside commitments, and the giving or receiving of sponsorship (whether awarded from outside or by the City Corporation), procurement activities, gifts and hospitality. In addition, where employees and other workers self-identify any other type of conflict / potential conflict of interest these should be disclosed as soon as they become aware of them.
20. Senior management are required to make disclosures or confirm a nil return on a wider range of categories than employees and other workers; this is in line with their responsibilities for the activities of the City Corporation, its workforce and for advising Members on the potential implications of political decisions.
21. An employee wishing to undertake additional employment will require permission in advance from their Chief Officer. The City Corporation will not prevent an employee from undertaking additional employment providing it does not conflict with the interests of, or in any way weaken public confidence in the City Corporation and does not in any way affect performance of their duties and responsibilities whilst they are at work; or where their current position could confer advantage to their private interest/personal gain. If there is a conflict the manager can ask an employee to discontinue with conflicting additional work or business interests. Permission given to undertake an additional role does not preclude the City Corporation taking action in response to its impact on their work performance.

Disclosure of Information

22. The law requires that certain types of information must be available to Members, auditors, government departments, service users and the public.
23. Most Committee agendas and most reports and background papers are required by law to be available for public inspection. Obstruction of a member of the public who wishes to exercise their lawful rights to access documents may be a criminal offence. Detailed guidance is available from the Town Clerk's department.

24. The public are specifically excluded from certain proceedings of Committees or meetings associated with the business of any Committee. No employee or other worker shall communicate to the public, the confidential content of such proceedings or any document relating to the City Corporation, unless required by law or expressly authorised by the Town Clerk to do so. Equally, no employee or other workers shall disclose confidential information to other employees or other workers who have no reason to know.
25. Employees and other workers have a responsibility to protect and not disclose commercially sensitive information unless required to effectively perform their duties. Guidance should be sought from the appropriate Chief Officer.
26. Employees and other workers have a duty to maintain confidentiality and must not disclose any information obtained in the course of their employment or engagement to any third party for any unauthorised reason.
27. Employees and other workers should not use any information obtained in the course of their employment for personal gain or benefit, nor should they pass it on to others who might use it in such a way.
28. Employees and other workers must not communicate confidential information or documents to others who do not have a legitimate right to know. Furthermore, such information which is stored on computer systems must also only be disclosed in accordance with the requirements of the Data Protection Act. A disclosure which complies with the requirements of the Whistleblowing Policy will be regarded as an authorised disclosure.

Political Neutrality

29. Employees and other workers serve the City Corporation as a whole and must not allow their own personal or political opinions to interfere with their work. They must serve all Members and colleagues; and must ensure that the individual rights of all Members and employees are respected. Employees and other workers whether or not politically restricted, must follow every lawfully expressed policy of the City Corporation. Where a City Corporation employee or other worker holds a politically restricted post such restriction is deemed to be incorporated in their contract of employment / engagement. (See the Politically Restricted Posts Policy).

Criminal Convictions and Driving Offences

30. Prospective employees and other workers will be asked to disclose convictions during the City Corporation's recruitment process in accordance with the DBS Code of Practice. Employees and other workers must declare actual convictions including driving offences during their employment. The existence of convictions will not preclude the appointment of candidates to the City Corporation unless relevant to the post.

31. During the course of employment or engagement, if required by the City Corporation due to the nature of their role, employees and other workers will be subject to repeat criminal record disclosure checks. (See the Disclosure and Barring Service Policy).

Relationships

Relatives and close personal relationships

32. Employees and other workers must declare using the Declaration of Interest Form (Officers) any close personal relationships they have with any candidates for appointment to a vacancy (as they become aware of them); a Member; contractor / potential contractor; City Corporation partner organisation; a service user; or as a manager / supervisor with an employee and other worker or vice versa to ensure that potential problems are avoided. Similarly, where a relationship is formed in the workplace and there is potential for conflict to arise, this should be declared. Any such disclosures will be dealt with sensitively.
33. To avoid accusations of impropriety employees and other workers should not be involved in the administration or decision-making in any City Corporation employment or service provision matters for relatives and anyone with whom they have a close personal relationship, including a child. (See the Conflicts of Interests Policy).

Other employees / workers and managers

34. All employees and other workers have a responsibility to act in a way that ensures dignity and respect for their colleagues. All employees and other workers are expected to adhere to the standards of behaviour as set out in the City Corporation's relevant Policies and Procedures. In particular not to unlawfully discriminate against colleagues, or engage in any form of harassment e.g. sexual, racial.
35. The City Corporation recognises that employees and other workers who work together may have or form close personal relationships. While it does not wish to interfere with these personal relationships, the City Corporation does expect all such employees and other workers to behave in an appropriate and professional manner at work.
36. Employees and other workers with their managers have a mutual responsibility to ensure good working relationships in compliance with the policies and procedures contained in the Employee Handbook. As part of this, employees and other workers should carry out any reasonable and lawful requests that their manager makes and to do so to the best of their ability; and behave courteously, reasonably and fairly in all dealings with their managers. Managers should endeavour to reasonably support employees and other workers in the proper performance of their duties, including assistance, where necessary, in working with others; and behave courteously, reasonably and fairly in all dealings with their teams.

Members

37. Employees and other workers are responsible to the City Corporation as an organisation through its Chief Officers and the Town Clerk and Chief Executive as the Head of Paid Service. The role of some employees is to give advice and information to Members and for all employees and other workers to implement the policies determined by the City Corporation.
38. Mutual respect between employees, other workers and Members is essential, and relationships should be conducted on a constructive and professional basis. In this regard, the City Corporation has adopted a Protocol on Member / Officer Relations.
39. Employees and other workers should self-declare any relationship they have with a Member in the interest of transparency and must not lobby Members inappropriately in relation to personal issues affecting either their employment or other matters personal to them. This does not preclude employees who are also residents of the City of London, from raising matters in relation to local matters, appropriately in their own time.

Public and service users

40. Employees and other workers should always remember their responsibilities to the public and service users they serve and ensure courteous, efficient and impartial service delivery to all groups and individuals as defined by the policy statements of the City Corporation. All stakeholders (e.g. residents, service users and city workers) have a right to be treated with fairness and equality.
41. Where an employee or other worker is either a relative or in a close personal relationship with a member of the public or service user, such relationships must be declared promptly to the line manager or senior manager to determine the appropriate action. (See the Conflicts of Interest Policy).

Other Employment Matters

42. Employees and other workers occupying posts which require registration with a statutory body (e.g. the Health and Care Professions Council (HCPC) Register of Social Workers), or any other mandatory membership, must ensure they maintain the necessary criteria to retain the relevant level of registration and provide evidence to their line manager accordingly. In addition, an employee or other worker must adhere with any duty to report issues with a bearing on their registration or membership and inform their line manager accordingly.
43. Employees and other workers shall dress in line with the appropriate standards set by individual departments. Any special clothing, including personal protective clothing and equipment, or uniform provided by the City Corporation must be worn where required.

- 44. Employees and other workers should ensure that they are displaying their corporate identification pass at all times with their photo clearly visible whilst on City Corporation premises and remove it on departure. Passes must be made available for inspection by security personnel and comply with any security requests or instructions whilst on City Corporation premises. (See the Security Policy - People).
- 45. All employees, other workers and volunteers are expected to notify their line manager if they are going to be absent from work; agency workers must inform their agency who will then notify the City Corporation. (See the Sickness Absence Policy).
- 46. All employees and other workers must be accurate in timekeeping at work, undertaking time recording where this is a requirement.

Press and media contact

- 47. Employees and other workers must not deal directly with the press or the media unless they have been expressly authorised by the Director of Communications or the Head of Media. All media enquiries received must be immediately referred to the Media Team, without engaging with the journalist. Any article, publication, or interview given on aspects of City Corporation policy or activity must be properly authorised by the Director of Communications or the Head of Media.

Equality and Inclusion

- 48. All members of the local community, customers and colleagues have a right to be treated with fairness and equity. All City Corporation employees and other workers must ensure that the City Corporation's policies relating to equality and inclusion are complied with in addition to the requirements of the law. Such policies would include the: Equal Opportunity Policy, Lone Working Policy (incorporating the Preventing Violence Policy), Grievance Procedure, Recruitment and Selection Policy and Managing People Policy. All members of the local community, customers and colleagues have a right to be treated with fairness and equity. The City Corporation has also adopted and expects compliance with the International Holocaust Remembrance Alliance definition of Antisemitism, attached as Appendix 1.

Data Protection, Information Technology and Security

- 49. The City Corporation encourages the use of appropriate technology to achieve efficient and effective services. Employees and other workers must ensure that they use technology professionally, appropriately and responsibly and follow the City Corporation's procedures in relation to the use of technology and access to / storage of information in relation to the General Data Protection Regulation and the Data Protection Act.
- 50. This also applies to external facing technology including social media which due to its nature means any comments posted either directly about or that could be associated with

the City Corporation should be regarded as public, whether made in a work or private capacity. Comments should not damage the reputation of the organisation, Members, employees, other workers or service users, or contravene the Equal Opportunity Policy. (See the Social Media Policy).

51. The City Corporation processes personal data collected in respect of the processes cited within the Code of Conduct in accordance with its Data Protection Policy (Employees) and Employee Privacy Notice. Data collected is held securely, accessed by and disclosed to individuals only for the purposes of conducting the relevant process (i.e. to ratify declarations, to investigate reported breaches) and related processes (where relevant), and as required by law.
52. Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with the corporate Data Protection Policy immediately. It may also constitute a disciplinary offence, which will be dealt with under the Disciplinary Procedure.
53. All employees and other workers must undertake data protection training as required by the City Corporation's Data Protection Officer.

Intellectual Property

54. Intellectual property is a generic term that includes inventions and patents, creative writings and drawings, photographs and images. If these are created by an employee or other worker during the course of employment or engagement, then as a general rule the property belongs to the City Corporation. Specific arrangements may exist locally.
55. Any matter or thing capable of being patented under the Patents Act 1977 whether made, developed or discovered by an employee, either alone or with others, whilst in the performance of their duties should be disclosed to the City Corporation through the appropriate Chief Officer, and subject to the provisions of the Patents Act, it will belong to and be the absolute property of the City Corporation.

Bribery, Corruption and Fraud

56. Employees and other workers must be aware that it is a serious criminal offence (and an act of gross misconduct) for them to corruptly receive or give any gift, loan, fee, reward or advantage for doing or not doing anything or showing favour or disfavour to any person in their official capacity. If an allegation is made it is for the employee or other worker to demonstrate that any such rewards have not been corruptly obtained. Such acts may compromise the impartiality of the City Corporation and cause reputational, legal and financial damage.
57. It is important to avoid the perception as well as the act of bribery or corruption. Employees and other workers must comply with all applicable bribery and corruption laws.

58. Employees and other workers will not offer, promise, give, request, or agree to receive, or accept any bribes:
- in the course of their employment;
 - when conducting City Corporation business; or
 - when representing the City Corporation in any capacity. A bribe means a financial payment or other forms of reward or advantage, whether direct or indirect, that is intended to induce or influence, or has the effect of inducing or influencing, an individual, company or public body (whether in the UK or abroad) to perform their functions, including business and public duties, improperly. Improper performance includes:
 - not acting in good faith;
 - not acting impartially; and
 - not acting in accordance with a position of trust.
59. Employees and other workers must not act fraudulently, whether in relation to finances, resources or other assets. For instance employees and other workers should not directly or indirectly seek to claim entitlement to a government benefit or service (e.g. heating and housing benefits, carer and disability benefits, Blue Badge etc.) from the City Corporation, government department or other local authority by misrepresenting their true circumstances or falsification of records to secure a form of benefit whether financial or otherwise for themselves or others.

Use of Financial Resources and Property

60. Employees and other workers must ensure that they use all City Corporation funds entrusted to them in a responsible and lawful manner. They should strive to ensure value for money and to avoid legal challenge to the City Corporation.
61. All employees and other workers should be aware of and adhere to the City Corporation's Financial Regulations, Procurement Code and the Acceptable Use of IT Policy.
62. Employees and other workers must not steal, misuse, wilfully damage or take off site without permission, anything that belongs to the City Corporation.
63. Employees and other workers must not use City Corporation resources to recognise or reward colleagues without the approval of their Chief Officer.

Health, Safety and Wellbeing

64. The City Corporation as a responsible employer is committed to supporting and encouraging employees to be healthy and resilient individuals. The City Corporation has chosen to adopt a holistic and proactive approach to workplace health, safety and wellbeing, adopting preventative measures; to safeguard the physical health and mental wellbeing of employees and other workers.

- 65. Employees and other workers are expected to ensure that a safe working environment is maintained and prevent the risk of injury to themselves and others in accordance with the City Corporation's Health and Safety Statement, occupational health and safety policies and guidance including any local arrangements. Employees and other workers are also expected to be proactive in reporting significant hazards or danger. They should inform their line manager in the first instance, or another appropriate senior person.
- 66. The City Corporation has an Alcohol and Drugs Misuse Policy which is aimed at ensuring that employees and other workers are fit to work to perform their duties.

Safeguarding

- 67. All employees and other workers have a responsibility to safeguard the welfare of children, young people and adults at risk, whatever the role of the individual, or the City Corporation service or department they work in.
- 68. Any allegations or concerns that children and adults may be suffering significant harm should be raised promptly with your line manager and the City Corporation's Children and Families Service or Adult Social Care Service (see the Safeguarding Policy).

Professional Indemnity

- 69. If an employee, former employee or volunteer (for the purpose of this paragraph, the term 'employee' refers to the narrow definition of employed staff), is subject to a claim for professional negligence from third parties, in relation to work they carried out as part of their duties for the City Corporation (including voluntary work approved by a Chief Officer carried out in connection with the City Corporation); they will be indemnified in relation to claims for damages and reasonable legal costs (subject as follows) for breaches of professional duty arising from the bona fide execution of their duties in accordance with current policies of the City Corporation. The City Corporation reserves the right to decide whether to defend (or contribute to the costs of defending) a legal action brought against an employee.

Raising Concerns and Whistleblowing

- 70. The City Corporation is committed to the highest possible standards of probity. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about the conduct of any aspect of the City Corporation's work to come forward and voice those concerns to us. It is recognised that most cases will have to proceed on a confidential basis.
- 71. Where employees or other workers have concerns around misconduct or the lawfulness of any action or proposed action, they should raise their concerns to the appropriate manager or Chief Officer without delay.

72. The Whistleblowing Policy is also available to employees and other workers who feel they need to raise an issue outside of the management chain. Any suspicion of wrongdoing will be treated seriously and will be reviewed and analysed in accordance with the Whistleblowing or Complaints Policy, considering the Public Interest Disclosure Act, the Human Rights Act and if appropriate the City Corporation's Anti-Fraud and Corruption Strategy.
73. City Corporation employees, agency workers, and contractors should be aware that they have statutory protection against victimisation and dismissal under the Public Interest Disclosure Act 1999 (PIDA)², if they speak out genuinely against corruption and malpractice at work (see the Regulation of Investigatory Powers Act Policy). Further information on how to make a disclosure is contained in the Whistleblowing Policy.

List of appendices

- Appendix 1 – International Holocaust Remembrance Alliance (IHRA) Definition of Antisemitism and Working Examples

Links / Other Resources

- Acceptable Use of IT Policy
- Alcohol and Drugs Misuse Policy
- Anti-Fraud and Corruption Strategy
- Conflicts of Interest Policy
- Data Protection Policy (includes the Employee Privacy Notice)
- Disciplinary Procedure
- DBS Code of Practice
- Disclosure and Barring Service Policy
- Equal Opportunity Policy
- Financial Regulations
- Gifts and Hospitality Declaration Form
- Grievance Procedure
- Health and Safety Statement
- Lone Working Policy (incorporating the Preventing Violence Policy)
- Managing People Policy
- Politically Restricted Posts Policy
- Procurement Code
- Protocol on Member / Officer Relations
- Recruitment and Selection Policy
- Regulation of Investigatory Powers Act Policy
- Safeguarding Policy

² PIDA was further strengthened by the Enterprise and Regulatory Reform Act 2013.

- Security Policy - People
- Sickness Absence Policy
- Social Media Policy
- Whistleblowing Policy