



CODE OF CONDUCT

CONTENTS

1. Scope
2. Standards
3. Disclosure of Information
4. Political Neutrality
5. Relationships
6. Appointments and Employment Matters
7. Outside Commitments
8. Intellectual Property
9. Information Technology and Data Security
10. Personal Interests
11. Equality
12. Corruption and Bribery
13. Use of Financial Resources and Property
14. Hospitality and Gifts
15. Sponsorship - Giving and Receiving
16. Health and Safety
17. Whistleblowing
18. Professional Indemnity

Appendix A - Relevant City of London Corporation Policies



CODE OF CONDUCT

1. Scope

- 1.1. This Code of Conduct (the 'Code') applies to all employees, workers and volunteers and their conduct both within the organisation and when dealing with other organisations as a representative of the City Corporation (for ease of reference the term "employees" will be used in the code but applies to all groups). There is a separate code of conduct for Councilmen (called Members in this Code). As far as possible, employees must also comply with the Code if they are appointed as a representative of the City Corporation on any organisation, trust or company. The principles detailed below are the basic ones governing all employees, but each Chief Officer may wish to issue further guidance specifically relating to his/her departmental service requirements which will supplement but not contradict the basic principles contained in this Code. The Code does not affect an employee's rights and responsibilities under the law; its purpose is to provide clear and helpful advice. These principles should be taken in conjunction with requirements set down by any employees' professional body.
- 1.2. Any substantive contravention of this code may result in disciplinary proceedings, and those disciplinary proceedings could end in dismissal. For those individuals not falling within the scope of disciplinary procedures appropriate action will be taken.

2. Standards

- 2.1. City Corporation employees are expected to give the highest possible standard of service to the public, service users, members and fellow employees, and where it is part of their duties, to provide advice to members and fellow employees with impartiality and in good faith.
- 2.2. This will be achieved in part through the demonstration of effective and appropriate behaviours defined internally, and adherence to the wider standards (Nolan Principles) of selflessness, objectivity, accountability, openness, leadership, honesty and integrity in which the public, Members, or managers can trust. Employees are expected to conduct themselves in a way that, in the reasonably held belief of the City Corporation, is not likely to fundamentally undermine the required relationship of trust and confidence between themselves and the organisation.
- 2.3. Employees are expected to adhere to City Corporation's core values which define the way the organisation works and how it plans to develop and wishes to be regarded by others, namely:



- The best of the old with the best of the new
 - The right services at the right price
 - Working in Partnership
- 2.4. Employees must not conduct themselves in a way that brings the Corporation, Employees, Members, Service Users and Partners into disrepute or causes reputational damage.
- 2.5. Employees 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 must report to the appropriate manager impropriety or any breaches of procedure.
- 2.6. Employees shall dress in line with the appropriate standards set by individual departments. Any special clothing, including personal protective equipment or identification provided by the City Corporation must be worn where required.
- 2.7. All employees are expected to be accurate in their time at work recording where this is a requirement.
- 2.8. Any declarations required by this Code must be in writing to your Chief Officer so that all parties can be assured that any declaration has been received.

3. Disclosure of Information

- 3.1. The law requires that certain types of information must be available to Members, auditors, government departments, service users and the public.
- 3.2. Most Committee agendas and most reports and background papers are required by law to be available for public inspection. Detailed guidance is available from the Town Clerk's department. Obstruction of a member of the public who wishes to exercise their lawful rights to access documents may be a criminal offence. If in doubt, refer to the Town Clerk or Comptroller for advice.
- 3.3. The public are specifically excluded from certain proceedings of Committees or meetings associated with the business of any Committee. No employee shall communicate to the public the 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.
- 3.4. Employees 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.



- 3.5. Employees have a duty to maintain confidentiality and must not disclose any information obtained in the course of their employment to any third party for any unauthorised reason.
- 3.6. Employees 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.
- 3.7. Employees 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 authorised disclosure.

4. Political Neutrality

- 4.1. Employees 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 fellow employees, and must ensure that the individual rights of all Members and employees are respected. Employees, whether or not politically restricted, must follow every lawfully expressed policy of the City Corporation. Where a City Corporation employee holds a politically restricted post such restriction is deemed to be incorporated in their contract of employment. (See policy on Politically Restricted Posts).

5. Relationships

Members

- 5.1. Employees are responsible to the City Corporation as an authority through its Chief Officers. The role of some staff is to give advice and information to Members and for all staff to implement the policies determined by the City Corporation. Mutual respect between employees and Members is essential, and relationships should be conducted on a constructive and professional basis. Employees must not lobby Members in relation to personal issues affecting either their employment or other matters personal to them.



Public and Service Users

- 5.2. Employees 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.

Contractors and Potential Contractors

- 5.3. All relationships of a direct or indirect pecuniary nature with external contractors, or potential contractors, should be made known to your Chief Officer. Orders and contracts must be awarded on merit, by fair competition against other tenders, and no special favour should be shown to businesses operated or controlled by, for example, friends, partners or relatives in the tendering process.
- 5.4. Employees who are privy to confidential information on tenders or costs for either internal or external contractors should not disclose that information to any unauthorised party or organisation.
- 5.5. Employees who engage or supervise contractors or have any other official relationship with contractors and have previously had or currently have a direct or indirect pecuniary interest with a contractor who is engaged or who is proposed to be engaged by the City Corporation, should declare that interest to the Chief Officer as soon as practicable.
- 5.6. Where a Chief Officer feels that any relationship is substantive, he/she will notify the Town Clerk who will then decide if Members need to be informed. The Chief Officer will determine any appropriate safeguards, including removing the officer in the engagement or supervision of the contractor taking advice from the Town Clerk as appropriate.
- 5.7. Employees should ensure that no special favour is shown to current or recent former employees or partners, close relatives or associates in awarding contracts to businesses run by them or employing them in a senior or relevant managerial capacity.

The Press and the Media

- 5.8. Employees must not deal directly with the press or the media unless required to do so in the course of their work or where they have been expressly authorised by a Chief Officer. All enquiries for information or comment on issues affecting the work of the City Corporation must be referred to the Public Relations Office. Any article, publication, or interview given on aspects of City Corporation policy



or activity must be properly authorised by the Public Relations Office and, where necessary, the Town Clerk.

Other Employees

- 5.9. All employees have a responsibility to act in a way that ensures dignity and respect for their colleagues. All employees are expected to adhere to the standards of behaviour as set out in the City Corporation's relevant Policies and Procedures and in particular not to discriminate against colleagues.
- 5.10. Staff and managers have a mutual responsibility to ensure good working relationships. As part of this, staff 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 staff in the proper performance of their duties, including assistance, where necessary, in working with other employees; and behave courteously, reasonably and fairly in all dealings with their staff.

6. Appointments and other Employment Matters

- 6.1. Employees involved in appointments should ensure that these are made on the basis of merit. It is unlawful for an employee to make an appointment which was based on anything other than the ability of the candidate to undertake the duties of the post. These principles and the City Corporation's procedures are detailed in the Recruitment and Selection Policy.
- 6.2. In order to avoid any possible accusation of bias, employees should not be involved in an appointment where they are related to an applicant, or have a close personal relationship with him or her. Candidates for any appointment with the City Corporation when making an application must disclose on the job application form whether s/he is related to any member of the City Corporation or to a holder of any senior officer position. Deliberate omission to make such a disclosure will disqualify the candidate and if the omission is discovered after appointment, s/he may be liable to dismissal.
- 6.3. All Employees need to disclose to the City Corporation any relationship known to exist between themselves and a candidate for an appointment of which they are aware.
- 6.4. The City Corporation recognises that employees 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 to behave in an appropriate and professional manner at work. To ensure that potential problems are avoided, if the relationship is between a manager/supervisor and an employee whom he/she supervises, the relationship



should be declared to either their immediate Line Manager, senior manager or HR Business Partner. Similarly any relationship which could potentially involve a conflict of interest in work roles, (e.g. countersigning of invoices or supervisory decisions relating to overtime etc.) should be declared. Any such disclosures will be dealt with sensitively. The City Corporation reserves the right, where such a relationship exists between staff, to ensure that the persons concerned are not employed in a situation where one would be responsible for managing the other. Alternative mitigating measures may be introduced to ensure that appropriate reporting lines are in place.

- 6.5. Employees should not be involved in decisions relating to discipline, promotion or pay adjustments for any other employee who is a relative, partner or someone they have a close personal relationship with.

7. Outside Commitments

- 7.1. Employees are required to obtain written consent from their Chief Officer to take any outside employment.
- 7.2. Employees' off-duty hours are their personal concern but they should not subordinate their duty to private interests so as to put themselves in a position where duty and private interests conflict. The City Corporation will not preclude employees from undertaking additional employment, but any such employment must not, in the view of the City Corporation:
- conflict with or react detrimentally to the City Corporation's interests, (for example, if their official duties overlap in some way with their proposed work)
 - in any way weaken public confidence in the conduct of the City Corporation's business
 - interfere with the employee's ability to undertake their role, e.g. cause a breach of the Working Time Directive or place demands on the individual such that they cannot perform at their full capacity for the City Corporation
 - make use of information or material to which the employee has access by virtue of his or her position
- 7.3. No outside work of any sort should be undertaken in the office or in Corporation working hours, and use of City Corporation facilities, equipment or materials e.g. telephones, photocopiers or IS systems for outside work is forbidden.
- 7.4. Any work undertaken on behalf of the City Corporation or which contributes to the work of the City Corporation or is requested/delivered on the basis of being an employee of the City Corporation and which attracts a fee/ is paid e.g. a presentation or lecture, will need Chief Officer approval and the fees will need to



be paid to the City Corporation. In the case of a Chief Officer, approval from the Town Clerk is required.

8. Intellectual Property

- 8.1. 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 during the course of employment then as a general rule the property belongs to the City Corporation. Specific arrangements may exist locally.
- 8.2. Any matter, or thing capable of being patented under the Patents Act 1977, 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.

9. Information Technology and Data Security

- 9.1. The City Corporation encourages the use of appropriate technology to achieve efficient and effective services. Employees 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 Data Protection Act. This also applies to external facing technology including social media which due to its nature means any comments posted about the City Corporation should be regarded as public, whether made in a work or private capacity and should not damage the reputation of the organisation, Members, staff or service users, or contravene the Equal Opportunities Policy.

10. Personal Interests

- 10.1. Employees must declare to their Chief Officer, any financial or non-financial interests that could bring about conflict with the City Corporation's interests. This may include membership of outside bodies in a personal capacity. In such cases employees should be mindful not to place themselves in a situation where their involvement or working contribution could compromise their continuing professional duty to the interests of the City Corporation.
- 10.2. Employees must declare to their Chief Officer membership of any organisation not open to the public with formal membership and commitment of allegiance and which has secrecy about rules and/or membership and/or conduct e.g. Masonics, a Society, Trust or regular gathering or meeting which is not open to members of the public who are not a member of the organisation. (This does not include membership of Livery Companies)



- 10.3. On no account must employees be directly involved in the processing of any matter or application in which they or any close relative (including a child) have a personal interest.

11. Equality

- 11.1. All City Corporation employees should ensure that policies relating to equality issues as agreed by the City Corporation are complied with in addition to the requirements of the law. Such policies would include: Equal Opportunities, Physical and Verbal Abuse Policy and Grievance (Employee Complaints). All members of the local community, customers and other employees have a right to be treated with fairness and equity.

12. Corruption and Bribery

- 12.1. Employees must be aware that it is a serious criminal offence (and an act of gross misconduct) for them corruptly to 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 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.
- 12.2. It is important to avoid the perception as well as the fact of corruption or bribery and employees must comply with all applicable bribery and corruption laws.
- 12.3. Employees 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.



- 12.4. Employees must not act fraudulently, particularly in relation to The City Corporation's resources or assets.

13. Use of Financial Resources and Property

- 13.1. Employees 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.
- 13.2. Employees should be aware of and adhere to the City Corporation's Financial Regulations, Procurement Regulations and the Communication and Information Systems Use Policy.
- 13.3. Where employees have concerns over the lawfulness of certain action they should express such concerns to the appropriate manager or Chief Officer without delay. The whistleblowing procedure is also available to staff who feel they need to raise an issue outside of the management chain.
- 13.4. Employees must not steal, wilfully damage or take off site without permission, anything that belongs to the City Corporation.
- 13.5. Employees must not use City Corporation resources to recognise or reward colleagues without the approval of their Chief Officer.

14. Hospitality and Gifts

- 14.1. There can be little doubt that the acceptance of gifts by employees from persons who have, or may seek to have, dealings with the City Corporation would be viewed by the public with grave suspicion and would make the employee concerned and the City Corporation extremely vulnerable to criticism.
- 14.2. An employee should tactfully refuse any personal gift which is offered to him/her or a close relative by, or indirectly attributable to any person or body who has, or may have, dealings of any kind whatsoever with the City Corporation or, who has applied, or may apply, to the City Corporation for any kind of decision.
- 14.3. The only exceptions to this rule that have been agreed are:-
- a) small gifts of only token value often given by way of trade advertisements to a wide range of people, e.g. calendars, diaries, pens, pencils and similar articles of use in the workplace (up to a maximum value of £20); or
 - b) Small gifts of only token value given on the conclusion of a courtesy visit or visit by/to dignitaries, (up to maximum value of £20)



- c) Working meals which are permissible, provided the employee has the approval of the Chief Officer
 - d) Chief Officers or appropriate employee nominated to represent them can attend work related functions as the City Corporation representative
- 14.4. When acting under this dispensation, employees must complete the appropriate declaration (e-form available on the intranet). The completed form will need to be sanctioned by the Line Manager in advance.
- 14.5. If there is any doubt about whether a gift may be accepted the gift should be politely and tactfully refused.
- 14.6. Employees are reminded that they are forbidden under the terms of their office and employment to accept any fee or reward other than their proper remuneration and any person who contravenes this provision would be liable to Court proceedings.
- 14.7. In the event of an employee receiving a gift without warning, which does not fall in any of the exceptions mentioned above, this should immediately be reported to a Chief Officer who will be responsible for deciding whether the gift should be returned.
- 14.8. Employees should only accept offers of hospitality if there is a genuine need to impart information or represent the City Corporation in the community, establish or maintain good business relationships, and/or improve the image and reputation of the City Corporation; provided that this is in good faith and not likely to secure advantage or have an intention to induce. Offers to attend purely social or sporting functions should be accepted only when these are part of the life of the community or where the City Corporation should be seen to be represented.
- 14.9. When acting under this dispensation, employees must complete the appropriate declaration e-form, which is accessible from the City Corporation's Intranet site before the hospitality is taken up. The completed form will automatically be forwarded to the employee's line manager for approval and copied to the Town Clerk's Department for monitoring purposes.
- 14.10. When hospitality has to be declined the offer should be courteously but firmly declined and it should be explained to the other party the procedures and standards operating within the City Corporation.
- 14.11. When receiving authorised hospitality employees should be particularly sensitive as to its timing in relation, for example, to decisions which the City Corporation may be taking affecting those providing the hospitality.



- 14.12. Acceptance by employees of hospitality through attendance at relevant conferences and courses is acceptable where it is clear the hospitality is corporate rather than personal, where the City Corporation gives consent. Where visits to inspect equipment or review services by undertaking site visits etc. are required, employees should ensure that the City Corporation meets the cost of such visits to avoid jeopardising the integrity of subsequent procurement decisions.
- 14.13. Hospitality should only be accepted where it is on a scale appropriate to the circumstances, reasonably incidental to the occasion and not extravagant and where it is apparent that no cause could reasonably arise for adverse criticism about the acceptance of hospitality.

15. Sponsorship – Giving and Receiving

- 15.1. Where an outside organisation wishes to sponsor or is seeking to sponsor a City Corporation activity, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts or hospitality apply. Particular care must be taken when dealing with contractors or potential contractors.
- 15.2. Where the City Corporation wishes to sponsor an event or service neither an employee nor any partner, spouse or relative must benefit from such sponsorship in a direct way without there being full disclosure to a Chief Officer of any such interest. Similarly, where the City Corporation through sponsorship, grant aid, financial or other means, gives support in the community, employees should ensure that impartial advice is given and that there is no conflict of interest involved.

16. Health & Safety

- 16.1. Employees 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 & Safety Statement, the Occupational Health and Safety Policies and guidance. This includes the Drug and Alcohol policy and any local arrangements.

17. Whistleblowing

- 17.1. 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.
- 17.2. 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.

- 17.3. City Corporation staff, agency staff, and contractors should be aware that they have statutory protection against victimisation and dismissal under the Public Interest Disclosure Act 1999, if they speak out genuinely against corruption and malpractice at work. Further information on how to make a disclosure is contained in the Whistleblowing Policy.

18. Professional Indemnity

- 18.1. If an employee, former employee or volunteer, (for the purpose of this paragraph, the term 'employees' 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.



Appendix A

Main Corporation policies that should be read in conjunction with the Code of Conduct:

- Communications and Information Systems Use
- Complaints Policy
- Corporate Anti-Fraud & Corruption Strategy
- Data Protection Policy
- Disciplinary Procedure
- Drug and Alcohol Misuse Policy
- Equal Opportunity Policy
- Health and Safety Statement
- Physical and Verbal Abuse
- Regulation of Investigatory Powers policy statement
- Whistleblowing Policy