



## **OFFICE OF THE NORTHAMPTONSHIRE POLICE AND CRIME COMMISSIONER**

### **CODE OF CONDUCT**

Version: Final

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#### **1. INTRODUCTION**

The public is entitled to expect the highest standards of conduct from all employees who work for the Office of the Police and Crime Commissioner. The environment necessitates the highest levels of integrity, conduct and accountability.

This code has been produced to ensure that everyone knows what is expected from them in terms of conduct and behaviour. A copy is issued to every employee.

Our Code of Conduct takes into account 'The Seven Principles of Public Life' which are included in the Nolan Committee's report on 'Standards in Public Life'. They are selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

This Code of Conduct should also be read in conjunction with the other relevant policies and procedures of the Office of the Police and Crime Commissioner.

#### **2. STANDARDS**

We expect you to give the highest possible standard of service to the public where this is part of your duties and to provide appropriate advice to the Police and Crime Commissioner and fellow employees with impartiality.

You will be expected, without fear of recrimination, to bring to the attention of your line manager or the Chief Executive any deficiency in the provision of service. You must report any impropriety or breach of procedure. Where necessary, you should refer to the Whistleblowing Policy.

#### **3. DISCLOSURE OF INFORMATION**

It is generally accepted that open government is best and in the case of the Office of the Police and Crime Commissioner this means undertaking as much of our business as possible in public. The law requires that certain types of information must be available to auditors, government departments, service users and the public. Obstructing a member of the public in exercising their right of access to such information is a criminal offence. The Office of the Police and Crime Commissioner may

voluntarily decide to disclose other types of information when the law permits such a disclosure. You must be aware of the information that you can disclose and which information cannot be disclosed. All information that the Office of the Police and Crime Commissioner handles is at least of the status of 'Official' and therefore care should be taken in determining what should and what should not be disclosed to the public. If you are in any doubt you should refer the matter to the Chief Executive who is also the Monitoring Officer.

In certain circumstances, you may have a legal or professional duty to disclose information to a third party e.g. in the course of legal proceedings. If you are asked by a third party to give evidence in legal proceedings about something that has happened in the course of your employment with the Office of the Police and Crime Commissioner you should seek immediate advice from the Chief Executive.

You should recognise the importance of information concerning an employee's private affairs and you must not supply this to any person unless you have obtained the consent of the individual or where you are required to do so by law. Any requests for the personal information of employees must be received in writing.

You should not use any information obtained in the course of your employment for personal gain or benefit and you should not pass any information on to others who might use it in such a way.

#### **4. POLITICAL NEUTRALITY**

You will be expected to carry out your duties in a politically neutral manner. You must not allow your own political opinions to interfere with your work. Schedule 16 part 3 (200) of the Police Reform and Social Responsibility Act 2011, confirms that all OPCC staff are politically restricted, with the exception of the Deputy Police and Crime Commissioner. It is the employees responsibility to ensure that they comply with the requirements and restrictions of being politically restricted.

#### **5. RELATIONSHIPS**

##### **The Local Community and Service Users**

You should always remember your responsibilities to the community you serve and ensure courteous, efficient and impartial service to all groups and individuals within that community.

##### **Contractors or Providers of Services**

All relationships of a business or private nature with external contractors or potential contractors should be notified to the Chief Executive in writing. Any orders and contracts must be awarded in accordance with the Office of the Police and Crime Commissioner's Contract Procedure Rules and Standing Orders, and Financial Regulations.

#### **6. APPOINTMENT AND OTHER EMPLOYMENT MATTERS**

If you are involved in appointments you should ensure these are made on the basis of merit. It would be unlawful for you to make an appointment which is based on anything other than the ability of the candidate to undertake the duties of the post. In order to avoid any possible accusation of bias, you must not be involved in any stage of the selection process where you are related to the applicant or have a close personal relationship.

If you are canvassed by a candidate or by a person on behalf of a candidate you should report this to the Chief Finance Officer who will liaise with the Chief Executive in order to ascertain the appropriate action to be taken.

Similarly, you should not be involved in decisions relating to discipline, promotion or pay for any employee who is a relative, partner or you have a close personal relationship with.

## **7. OUTSIDE COMMITMENTS**

What you do outside of working hours is, in most cases, your personal concern. However, you have a contractual obligation to the Office of the Police and Crime Commissioner and you must not put yourself in a position where there is a conflict of interest. If there are any potential issues you should discuss this with your line manager or the Chief Executive.

You must have due regard to the ownership of copyright and intellectual property rights that may arise out of your employment in the Office of the Police and Crime Commissioner and follow any policies that may be adopted in relation to this. The areas covered include project work, reports and images.

## **8. PERSONAL INTERESTS**

You must declare to your line manager or the Chief Executive any financial interests or non-financial interests that you consider could bring about a conflict with the interests of the Office of the Police and Crime Commissioner. Any outside business interests (including Company Directorships, as an employee of another organisation and “self-employed” work) must be declared in writing to your line manager or the Chief Executive. No employee of the Office of the Northamptonshire Police and Crime Commissioner may, under any circumstances, have any involvement with any organisation providing, or seeking to provide, services to the Police and Crime Commission or Northamptonshire Police Force.

If you are a member of any organisation, pressure group or secret society or have any other involvement with an organisation that may seek to influence the Police and Crime Commissioner’s policies you must declare this to the Chief Executive.

A secret society is defined as:

‘any lodge, chapter, society, trust or regular gathering or meeting which:

- Is not open to the public who are not members of that lodge, chapter, society or trust;
- Includes in the grant of membership an obligation on the part of the member a requirement to make a commitment (whether by oath or otherwise) of allegiance to the lodge, chapter, society, trust, gathering or meeting and
- Includes whether initially or subsequently, a commitment (whether by oath or otherwise) of secrecy about the rules, membership or conduct of the lodge, chapter, society, trust, gathering or meeting.

A lodge, chapter, society, trust, gathering or meeting is defined above, and should not be regarded as a secret society if it forms part of the activity of a generally recognised religion.

## **9. EQUALITY ISSUES**

You must ensure that you comply with all Equality and Diversity policies of the Office of the Police and Crime Commissioner as well as meeting legal requirements. You have a responsibility to treat all members of the local community, customers, service users and other employees equally and fairly and you must not unlawfully discriminate against them.

We have a legal obligation to provide a harassment free environment and will not tolerate or accept any form of harassment or bullying, either within the workplace or in the context of our work with communities.

#### **10. HEALTH AND SAFETY**

You must ensure that you are fully conversant with the health and safety policies of the Office of the Police and Crime Commissioner in relation to your area of employment.

#### **11. USE OF PROPERTY AND FACILITIES**

The Office of the Police and Crime Commissioner provides facilities, equipment and other property to facilitate the conduct of business. You should not use anything provided to you for personal use without the express permission of the Chief Executive.

If you have been given permission to use anything for private purposes you must reimburse the Office of the Police and Crime Commissioner for any additional costs incurred as part of this arrangement.

#### **12. SEPARATION OF ROLES DURING TENDERING**

If you are involved in the tendering process and deal with contractors or suppliers of services you should be clear on the separation of client and contractor roles within the Office of the Police and Crime Commissioner. If you have both a client and contractor responsibility you must be aware of the need for accountability and openness.

If you are privy to confidential information on tenders or costs for either internal or external contractors you should not disclose this information to any unauthorised party or organisation.

You should ensure that no special favour is shown to current or recent former employees or their partners, close relatives or associates in the awarding of contracts to businesses run by them or employing them in a senior or relevant managerial capacity.

#### **13. CORRUPTION**

You must be aware that it is a serious criminal offence for you to corruptly receive or give any gift, loan, fee, payment, reward or advantage for doing or not doing anything or showing favour or disfavour to any person in your official capacity. If an allegation is made against you, the law requires you to demonstrate that any such rewards have not been corruptly obtained.

#### **14. USE OF FINANCIAL RESOURCES**

You must ensure that you use public funds entrusted to you in a responsible and lawful manner. You should strive to ensure value for money to the local community and to avoid legal challenge. You should comply at all times with the Office of the Police and Crime Commissioner's Financial Regulations and Standing Orders.

#### **15. HOSPITALITY AND GIFTS**

The offer of gifts, hospitality or other benefits is a particular source of conflict between public and private interest. Acceptance of hospitality or gifts could cause suspicion as to the motives involved

which could leave both the individual and the Office of the Police and Crime Commissioner at risk of criticism.

You should only accept offers of hospitality if there is a genuine need to impart information or represent the Office of the Police and Crime Commissioner in the community. Offers to attend purely social or sporting functions should be accepted only when these are seen as part of the life of the community and where the Office of the Police and Crime Commissioner should be seen to be represented. Attendance should be authorised in advance by the Chief Executive and a record kept of the authorisation.

When you have to decline hospitality you should do so courteously, but firmly with those making the offer. You should inform them of the procedures and standards operating within the Office of the Police and Crime Commissioner.

You should not accept personal gifts from contractors, outside suppliers or members of the public. The only exception would be gifts of token value which can be used in the work situation e.g. diaries, calendars, pens. If you are in any doubt about accepting a gift you should consult the Chief Executive and adhere to their advice.

If you are receiving authorised hospitality you should be particularly sensitive as to its timing in relation to decisions which the Office of the Police and Crime Commissioner may be taking affecting those providing the hospitality. E.g. awarding of contracts.

You may accept hospitality if it is through your attendance at a relevant conference or course where it is clear the hospitality is corporate rather than personal and you have obtained prior consent and your line manager is satisfied that any purchasing decisions are not being compromised.

You should not seek for your own use or for the use of any of your family, the goods or services from any suppliers or contractors to the Office of the Police and Crime Commissioner as a result of your employment.

Any gifts or hospitality offered (other than those of token value) to you should be declared to the Chief Executive and the decision made by them should be recorded.

## **16. SPONSORSHIP – GIVING AND RECEIVING**

Where an outside organisation wishes to sponsor, or is seeking to sponsor an activity run by the Office of the Police and Crime Commissioner, 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.

Where the Office of the Police and Crime Commissioner wishes to sponsor an event or service, an employee or any partner, spouse or relative must not benefit from such sponsorship in a direct way without there being full disclosure to the Chief Executive of any such interest. Similarly, where the Office of the Police and Crime Commissioner through sponsorship, grant aid, financial or other means gives support in the community, you should ensure that impartial advice is given and that there is no conflict of interest involved.

## **17. Review**

This policy will be subject to review at least annually.

18 April 2016