

**CONSTITUTION OF THE  
LONDON BOROUGH OF CROYDON**

**PART 5.J**

**OFFICER CODE OF CONDUCT**

---

<b>Contents</b>	
<b>1</b>	<a href="#"><u>General Principles</u></a>
<b>2</b>	<a href="#"><u>Who the code applies to</u></a>
<b>3</b>	<a href="#"><u>Overview and Reporting</u></a>
<b>4</b>	<a href="#"><u>Political neutrality</u></a>
<b>5</b>	<a href="#"><u>Council policies and legal requirements</u></a>
<b>6</b>	<a href="#"><u>Health &amp; Safety</u></a>
<b>7</b>	<a href="#"><u>Standards of behaviour</u></a>
<b>8</b>	<a href="#"><u>Standards of appearance</u></a>
<b>9</b>	<a href="#"><u>Declarations of Interest</u></a>
<b>10</b>	<a href="#"><u>Tendering / dealing with contractors</u></a>
<b>11</b>	<a href="#"><u>Gifts, hospitality and legacies</u></a>
<b>12</b>	<a href="#"><u>Membership of other bodies</u></a>
<b>13</b>	<a href="#"><u>Reporting of Criminal Offences</u></a>
<b>14</b>	<a href="#"><u>Protecting children and vulnerable adults</u></a>
<b>15</b>	<a href="#"><u>Using council resources and assets</u></a>
<b>16</b>	<a href="#"><u>Misusing your position</u></a>
<b>17</b>	<a href="#"><u>Confidentiality and data protection</u></a>
<b>18</b>	<a href="#"><u>Relationships with other people</u></a>
<b>19</b>	<a href="#"><u>Use of social media</u></a>
<b>20</b>	<a href="#"><u>Contacting and responding to the media</u></a>
<b>21</b>	<a href="#"><u>Your personal affairs</u></a>
<b>22</b>	<a href="#"><u>Alcohol and drugs</u></a>
<b>23</b>	<a href="#"><u>The role of the monitoring officer</u></a>
<b>24</b>	<a href="#"><u>Where to get help and further information</u></a>
<b>Appendix A</b>	<a href="#"><u>The Seven Principles of Public Life</u></a>
<b>Appendix B</b>	<a href="#"><u>Standards of behaviour at work</u></a>
<b>Appendix C</b>	<a href="#"><u>Standards of appearance at work</u></a>

## **1. General Principles**

Croydon Council provides services that have an impact on the lives of those working and living in the borough and handles millions of pounds of public money every year. Our dedicated workforce is our greatest strength and the public trusts us to work for it in a professional, fair, inclusive and honest way.

So it is important that you are clear about what the Council expects from you in terms of how you carry out your work, behave, respect and treat your colleagues and members of the public. The code of conduct sets out these expectations and together with our values it reflects our culture and the sort of organisation that we want to be.

These values are:-

**One team:** Crossing boundaries to work together towards shared goals with colleagues, partners and communities.

**Proud to serve:** Striving to always do our best for the community. Getting the most from limited resources and using taxpayer's money wisely.

**Honest and open:-**Working hard to build trust by treating everyone with honesty and integrity.

**Taking responsibility:** - Encouraging and supporting each other to take responsibility and show what we can do, learning together and recognising all of our contributions.

**Valuing Diversity:** - We make the most of the many perspectives that make Croydon distinctive.

It is important that you read, understand and follow the code and doing so will ensure that we are all working to the standards that the public expects and will help make the Council a good place to work.

If you are at all uncertain, you should be guided by the key principle that even if your actions, decisions or behaviour are proper, you need to ensure that you are above suspicion and there is no appearance or perception of improper conduct.

Everyone who works at Croydon Council has a responsibility to our residents and those who use our services. That is why it is so important we ensure that we are "doing the right thing" and adhering to the high standards of governance at the Council. We are accountable to the people who use our services and live within the borough, and so it is vital that we conduct our business with honesty, transparency and accountability.

There are other codes that are important for you to understand and which you should read alongside this one. These include (for example), the council's financial regulations, schemes of delegation, expenses policy, anti-bribery and whistleblowing policies. You can find details of these documents and other essential regulations here: <https://intranet.croydon.gov.uk/working-croydon/governance/how-we-do-things/governance-how-we-do-things-overview>

Everyone in public office at all levels; all who serve the public or deliver public services, including ministers, civil servants, councillors and local authority officers; should uphold the Seven Principles of Public Life, also known as the Nolan Principles (Appendix A).

You can also find lots of other useful guidance in the policies listed at the end of the code or on the 'Good Governance - doing the right thing' section of the Intranet. This covers information on your authority to act as an officer of the Council, how the Council governs, how its processes work and the standards you have to consider and adhere to as an employee.

E-learning is available and all employees should undertake this. You can find this learning on the [Croydon Learning](#) website.

## **2. Who the code of conduct applies to**

The code of conduct applies to everyone who is employed directly or works for or on behalf of the London Borough of Croydon. This includes all those employed directly on a permanent, temporary or casual basis and those employed indirectly, including agency staff and consultants. The code also applies to those who are external secondees and office holders. All officers must follow this code. Breaches of the code may be treated as a disciplinary offence and may lead to disciplinary action which could result in dismissal. In some cases a breach of the code may result in criminal prosecution. It should be noted that in the event of pending criminal prosecutions the council reserves the right to investigate and conclude any employment related disciplinary proceedings.

## **3. Overview and Reporting**

The Council expects that you:

- Act in a way which means that residents have confidence in your honesty and integrity.
- Respect your colleagues and the public.
- Treat other people professionally and do not discriminate against them.
- Deliver the best possible and efficient service to customers in accordance with the Council's standards and policies at the time.

This includes:

- How you behave (or are perceived to behave) both inside and outside of work.
- How you use public money and other resources.
- Acting with honesty, impartiality and objectivity.
- Working with the Council's suppliers and contractors in an honest and open way where there is no perception of improper conduct including corruption
- Not allowing personal interests to affect your work.
- Ensuring that you, your family or your friends, must not gain financial or other benefits from the decisions or actions you take whilst working for the Council.
- Always declaring any interests you have outside work that relate to your work for the Council. You must always think how your actions would look to the residents of Croydon.
- Telling us if you are charged, cautioned or convicted of a criminal offence, immediately such criminal charges occur. This may mean you are unsuitable to work for the Council, even if the offence is not connected to your work and could lead to the termination of your employment.

If you are at all uncertain, you should be guided by the key principle that even if your actions, decisions or behaviour are proper, you need to ensure that you are above suspicion and there is no perception or appearance of improper conduct.

If you are unsure what is expected, you should raise the matter with your manager, Corporate Director, the Chief People Officer, or the Head of Internal Audit.

### **Reporting**

It is important to ensure we maintain the public's trust in us and you must tell us about any:

- a) Personal interests which may affect your work or the decisions that you make.

- b) Actual or suspected theft, fraud, bribery or corruption by someone working for the Council, a supplier, councillor or a member of the public.
- c) Loss or improper disclosure of any Council data or information or breach of confidentiality.
- d) Discrimination, bullying, harassment or similar behaviour.
- e) Person misusing their position.
- f) Suspicions that a colleague is under the influence of drugs or alcohol at work.
- g) Suspicions or information that the conduct or behaviour of others is in any way inappropriate in relation to children and vulnerable adults.
- h) Suspected breaches of health and safety codes of practice and policies.

We will take your concern, complaint or grievance seriously and handle it sensitively using the appropriate Council procedure.

You should as soon as reasonably possible raise any concern (where possible initially with your manager), but as a minimum with the Corporate Director, Chief People Officer or Head of Internal Audit.

To make it easier for you to raise your concerns the Council also has a procedure which allows you to raise your concern confidentially and, if necessary, outside your department. This is the **Whistleblowing Policy** and you can find this on the [Intranet](#).

#### **4. Political neutrality**

As an officer you work for the Council as a whole and not just the majority group. You must not allow your personal political opinions to interfere with providing balanced professional advice. This must always be done in a politically neutral way and you must be prepared to explain your advice to all political groups. You should bear in mind that you may be called to account for your advice, for example to an overview and scrutiny committee.

You should also refrain from making political comments in public or on social media. Failure to do so could compromise your neutrality and bring the council into disrepute as officers are supposed to not express political views which could result in disciplinary action, including dismissal.

If you are asked by a Councillor to provide assistance on a matter that you feel is clearly political, or which does not have a clear link with the work of the Council, you should seek the advice of your Corporate Director or the Director of Legal Services (the Council's Monitoring Officer).

If you are asked to attend any meetings of any political group of the Council, you should consult your Corporate Director before accepting the invitation.

#### **Political activity**

You are not eligible to stand for office as a Councillor of the London Borough of Croydon, but you may stand for office in another Council providing you are not in a politically restricted post (see paragraph below).

#### **Politically restricted posts**

Some officers, normally those in more senior positions, are in posts where political activity is restricted through the Local Government and Housing Act 1989. This Act prevents them from taking part in certain political activities outside their work. If this applies, you should have been informed in writing, and it may be included in your contract of employment. You should, if this is the case, have been informed of the rules for claiming exemption. If you are not sure about your position, you should contact your manager or Human Resources. Guidance on which posts can be classified as politically restricted can be found in the [HR Handbook](#), Module 02, Chpt 8.

The political activities which are restricted for these officers include:

- standing as a Member of Parliament, or a Councillor in any local authority (other than a Parish Council)
- holding office in a political party at any level, (except in limited roles concerned only with the internal membership of the party)
- canvassing at elections
- speaking in public or publishing any written or artistic work which appears to be intended to influence public support for a political party.

You need to be aware of your position in terms of political activity. If you are not sure whether an activity is subject to 'political activity restrictions', you should seek advice from your Corporate Director or Human Resources, who will consult the Director of Legal Services (the Council's Monitoring Officer) if necessary.

Violation of the statutory rules is a breach of contract and will render you liable for investigation under the Council's Disciplinary Procedure ([HR Handbook](#), Module 11, and Chpt 2) which could include action be taken up to and including dismissal.

## **5. Council policies and legal requirements**

As a Council officer, you must ensure you are familiar with the legal and/or statutory requirements of your job. You must work within this framework and in such a way as to comply with the Council's policies and procedures at all times.

All members of the local community, service users and officers have the right to be treated fairly and impartially. As a Council officer you must comply with all Council policies relating to equalities and to the other requirements of the law

## **6. Health and Safety**

The Council has a legal duty of care for the health, safety and welfare of its employees. In addition, all employees must take reasonable steps to protect their own health and safety and that of other people who may be affected by their actions, or omissions, at work. Some employees, particularly managers have specific responsibilities, and these are detailed in the Council's corporate and specific departmental health and safety policies and procedures. The Council's corporate health and safety policy and procedures are available on the Intranet (<https://intranet.croydon.gov.uk/working-croydon/health-and-safety/health-and-safety-policies>)

The Council's corporate health and safety policy and procedures and guidance documents provide advice on health and safety including accident reporting, fire safety policy, visual

display screens and risk assessments, violence to staff and lone and night working. Some departments have their own codes of practice as which should be available from line management . If you are not sure what the safety procedures are or where to get protective clothing and equipment you must raise this with your manager.

You can also seek further advice and guidance from The Health & Safety team, Human Resources, or your trade union safety representative.

You have a duty to help prevent accidents and injuries at work by being aware of the policies that apply to your work and complying with them at all times:

**You must:**

- comply with all instructions relating to health and safety and security procedures
- use the protective clothing and equipment that the Council supplies to you
- follow the health and safety codes of practice and policies which are relevant to your work
- comply with hygiene requirements
- at the earliest opportunity, report any hazards, defects, accidents or incidents that you become aware of to your manager or supervisor
- not interfere with, or misuse anything provided for health, safety or welfare
- avoid risk of injury or danger to yourself or others
- leave any Council building as soon as the fire alarm sounds and follow any instructions of the fire wardens and the person managing the incident
- inform the Council of any other work that you do which, when added to your Council working hours, would take your total working hours above 48 hours per week
- inform the Council of any medical condition you have which would be adversely affected by the work that you are employed to do
- not smoke in any Council premises or vehicles and comply with the Council's Smoking Policy.

Managers have some additional responsibilities set out in the corporate and departmental health and safety policies and codes of practice.

**These include:**

- providing appropriate health and safety induction for all new employees
- carrying out a risk assessment for the activities undertaken by employees and ensuring that the risk assessment outcomes are implemented as appropriate and are suitable and sufficient
- informing employees of the risks associated with the work being undertaken and of the precautions that must be taken in order to prevent or reduce the risk of accidents and/or work-related ill health.

## **7. Standards of behaviour**

We have standards of behaviour which we expect from you. They make the Council a good place to work and ensure that colleagues and customers feel welcomed and valued. This includes complying with the Council's commitment to equality.

We expect all officers who work for, or on behalf of, the council to commit to the following:

- not to bully any person
- not to harass any person
- to promote equalities and not discriminate unlawfully against any person

People working for the Council and our customers are entitled:

- To be treated with dignity, respect, courtesy and fairness.
- Not to be bullied, harassed or victimised.
- Not to experience any form of unlawful discrimination.

We will not tolerate unfair, offensive or unlawful discriminatory behaviour carried out by, or against, any member of staff. It can be regarded as a serious disciplinary offence, which may result in disciplinary action, which could lead to dismissal. In certain circumstances, it could also lead to criminal proceedings.

Discriminatory, unacceptable or offensive behaviour can take many different forms. Remember that your colleagues and our residents may have different standards from you and may be offended or feel harassed by behaviour that you think is acceptable. To help us all understand this, we have produced a more detailed guide, with practical examples (see Appendix B).

If you feel that you have been subject to this sort of behaviour you should first of all discuss this with the other person and your manager and try and resolve it informally. If this is not possible or appropriate, or you are unsatisfied with the response, you should use the Council's employee grievance procedure.

If you experience such behaviour from someone not employed by the Council e.g. a service user, resident or member of the public, you should notify your manager immediately so that the incident can be recorded and appropriate action taken. In line with the council's equality statement; the council does not tolerate harassment, victimisation or unlawful discrimination in service delivery and employment on the grounds of age, disability, gender reassignment, race/ethnicity, religion or belief, sex/gender, sexual orientation, marriage & civil partnership, and pregnancy & maternity

## **8. Standards of appearance**

How you look and dress at work has an impact on how people view the Council. We recognise that:

- Different types of dress (e.g. protective clothing) are needed or appropriate for different types of work.
- Our employees come from a large range of backgrounds, cultures and ages with different styles of dress.
- Sometimes more casual clothing may be appropriate (e.g. for youth workers or on off-site training courses or approved 'dress down' days).

The Council has set out acceptable standards of dress (see Appendix C).

## 9. Declarations of Interest

There may be occasions when there is scope for conflict between the Council's interests and your own.

It is very important that you do not let your personal interests influence the work that you do or the decisions that you make for the Council – or put yourself in a position that might lead a person to accuse you of doing so. You must not allow your private interests or beliefs to conflict with your professional duty.

Where a matter affects your financial or personal interests or well-being so that a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest, you must disclose the interest.

You must not misuse your official position or information acquired in the course of your employment to further your private and personal interests, or the interests of others. Private and personal interests include those of your family, as well as those arising through membership of, or association with clubs, societies or other organisations and voluntary bodies. It is important for conflicts of interests to be clearly seen with no perceptions of bias or favouritism.

You must tell us about any financial and non-financial interests that could bring you into conflict with the Council's interests. These include any personal interests that could potentially influence your work, even if these seem very small and insignificant. Examples of situations that you must tell us about are set out below; but these should not be viewed as the only circumstances in which you must declare a conflict of interest.

- If you own land and/or a property in the borough where you receive rent from someone on housing benefit or otherwise are or become a landlord within the borough.
- If you have links of any sort (including, but not limited to, as a director, company secretary, trustee, partner, shareholder, owner contractor or employee) with an outside organisation which may work for the Council or supply goods and services to it (or are tendering or preparing to do so), or which may receive or apply for grants or other benefits from the Council, (if you are involved in the grant allocation process or where this could create a conflict of interest).
- You or anyone in your household or a close relative (parents/siblings/children) submit a planning or licensing application in the borough.
- Live near a property where a planning or licensing application has been submitted.
- Receive any services or grants from the Council (except the services that all residents are entitled to like refuse collection or schools).
- Are related or have a close relationship with anyone who:
  - Works at the Council
  - Does work for the Council or supplies goods and services to it
  - Is an elected member
  - Is a client of the Council
  - Is submitting a tender for work for the Council



- Are a member of a group or voluntary organisation which gets funding or a grant from the Council;
- Do work for another organisation in the borough (such as being a school governor or on the board of an NHS organisation) or are nominated/appointed to a position on behalf of the council in another organisation in the borough
- A member of your family or friends are applying for employment with the Council

A conflict of interest may also arise when you have a direct interest in the outcome of a Council decision. If this is the case then in order to protect yourself from any appearance of improper conduct **you should inform your manager immediately** that you are aware of the situation.

**If you have any of these interests you must register it by completing a [formal declaration of interest](#), which must be reviewed and signed off by your line manager and director.** Once completed this should be submitted to [governance@croydon.gov.uk](mailto:governance@croydon.gov.uk). You should also seek advice via the governance team on ext 65575 if you are not sure if you need to declare an interest, or if you've declared interest(s) changes.

If you are involved with a company or organisation tendering for a Council contract you must inform your Director by completing [a formal declaration](#). It may be a criminal offence if you do not.

**Officers in Tiers 1 – 3 (Head of Service and above) are required to complete an annual declaration of interest. However, should a conflict arise at any time you must report it to your manager immediately and declare it in writing as above and not wait until the annual declaration.**

**Line managers should contact the governance team ([governance@croydon.gov.uk](mailto:governance@croydon.gov.uk) or ext 65575) for guidance if a member of staff notifies them of a potential conflict of interest.**

See [Declarations of Interest Guidance](#) on the intranet for more information

## **10. Tendering / dealing with contractors**

Orders and contracts must be awarded on merit by fair competition against other tenders and in accordance with the Council's Standing Orders ([www.croydon.gov.uk/constitution](http://www.croydon.gov.uk/constitution)), Financial Regulations and Procedures and Tenders and Contracts Regulations. You must not show favouritism to any contractor. You must also make sure that no special favour is shown to current or recent former employers, officers or their partners, close relatives or associates in awarding contracts.

If you are involved in the tendering process and deal with contractors, you must be clear about the need for the separation of client and contractor roles. You must also make sure that if you are privy to confidential information on tenders or costs for either internal or external contractors, you do not disclose such information to any unauthorised party or organisation.

If, as part of your job, you are involved with or supervise contractors, and you have any kind of personal or other relationship with a contractor or potential contractor, the law states that you must disclose this relationship to the Council as your employer. Any such relationships should be disclosed to your manager by submitting a declaration of interest.

## **11. Gifts, hospitality and legacies**

### **Gifts**

From time to time, you may be offered gifts or hospitality by a customer, client or service user. We have clear rules on this so that you are not open to allegations of bribery, or placed in a difficult position.

Generally gifts and offers of hospitality should be politely refused. Sometimes, exceptions may be made for very small items such as pens or diaries. These principles also apply to your personal life, if the offer is made to you in connection with you being an employee of the Council.

You must avoid putting yourself in a position where you can be thought to be acting improperly and must not ask for any gift or tip

If you are offered a gift, you must report it to your manager (whether the gift is accepted or declined), so that the gift can be recorded in the departmental hospitality register <https://intranet.croydon.gov.uk/working-croydon/governance/being-employee/accepting-gifts-and-hospitality>.

Gifts that are not acceptable must be declined or returned.

### **Hospitality**

When considering offers of hospitality you should consider whether:

- the invitation comes from an organisation likely to benefit from the Council
- the organisation is seeking a contract with the Council, or already has a contract with the Council
- the hospitality is part of a conference, seminar etc. or is more of a social function
- the scale and location of the hospitality is proportionate to the event
- the event takes place outside normal working hours
- it is being offered on a frequent basis
- it is being offered just to you or to others as well.

You should not accept any offers of entertainment (such as tickets to sports events or the theatre, or hotel accommodation) without the Chief Executive's permission and you should actively seek to avoid getting into a position where such offers are made to you.

If you are offered any hospitality, entertainment or favours you must report it to your manager and record it in your department's Gifts & Hospitality register, whether it is accepted or not. You may accept reasonable hospitality, such as tea, coffee and light refreshments when you are for example visiting another organisation, or a resident's home or are on a training course.

Some employees will be required to make an annual declaration of interest. These groups of staff are listed on the intranet: <https://intranet.croydon.gov.uk/working-croydon/governance/being-employee/declarations-interest>. The governance team will normally contact these staff on an annual basis. Please note that this instance of declaration of interest is in addition to, and not instead of, your duty to report any individual matter immediately.

If you are in any doubt please see the Council's [gifts and hospitality policy](#) on the intranet or take advice from your Head of Service, or [governance@croydon.gov.uk](mailto:governance@croydon.gov.uk).

## Legacies

On occasions, members of the public or service users may wish to express their appreciation of the services they have received from a particular member of staff by leaving them money/gifts in their will. This is likely to be more common where employees work closely with and / or care for vulnerable people as a part of their duties.

If a client or member of the public suggests to you that they are considering giving or leaving you money or gifts, you must firmly but politely discourage them from doing so. You should explain the difficulty that this may cause you and that people you meet through your work do not leave you things in their will. You must also report the matter to your manager, who should contact the governance team for guidance: [governance@croydon.gov.uk](mailto:governance@croydon.gov.uk) or ext 65575.

In the event that any gifts or monies are left to you in a will, you must declare the fact to your Head of Service immediately. Under no circumstances must you accept the bequest. Failure to comply with these rules is likely to lead to disciplinary action including the possibility of dismissal.

## 12. Membership of other bodies

Your membership of an outside organisation (including societies, professional bodies, voluntary groups or lobbying organisations) may be perceived as affecting the work you do or the decisions that you make. You must make sure that your outside interests do not:

- Conflict with your Council role.
- Put you in a position which might influence decisions you take at work.
- Put you in a position where you might promote the outside body's interests whilst at work.
- Conflict with the Council's policy and approach on equalities and diversity.
- If you are in doubt regarding your membership of an outside organisation, you should discuss with your line manager in the first instance, to find out if you should register your membership by completing a [formal declaration of interest](#).

In particular you must tell us if you belong to:

- A 'secret' society.
- A group which may be considered discriminatory.
- A group which has a contract or potential contract with the Council.
- A group which receives funding or support from the Council.

We define a 'secret' society as one that is not open to members of the public unless they join it and requires its members to make some sort of commitment to the society, such as an oath of allegiance.

### **13. Reporting of Criminal Offences**

As an employee of the Council, you are expected to conduct yourself at all times (inside and outside of work) in a manner that will maintain public confidence in both your personal integrity and in the good reputation of the Council.

In general, what you do outside of work is your personal concern unless your actions would affect your suitability to carry out your post or cause a breakdown in the Council's employment relationship with you and/or damage the image and reputation of the Council.

You must inform your manager as soon as possible if you are arrested (even if no action is taken against you) or you are subsequently cautioned or convicted in connection with any offence. This does not include minor driving offences such as fixed-penalty notices for speeding unless:

- driving is a key requirement of your job, for example, you drive a Council vehicle or you drive your own vehicle regularly on Council business
- the conviction results in disqualification from driving

Disclosing that you have been arrested, cautioned or convicted of a criminal offence does not necessarily mean that disciplinary action will be taken against you. Consideration will be given to the extent to which your conduct:

- affects your suitability to carry out your job
- impacts on work colleagues, customers, contractors/partners with whom the Council works
- impacts on the Council's valued image and reputation and
- undermines the trust and confidence that the Council must have in you as one of its employees.

Failing to disclose such information, even where no charges are brought against you, may also lead to disciplinary action under the Council's Disciplinary Procedure.

### **14. Protecting children and vulnerable adults**

We are committed to safeguarding the interests of children and vulnerable adults and expect all staff to protect the interests and welfare of children, young people and adults at risk.

Even if your job does not involve you working directly with these groups, we expect you to report suspected acts of abuse or inappropriate behaviour against children or vulnerable adults.

### **15. Using Council resources and assets**

Council resources and assets include not only physical objects and financial resources but also computer data and information generally. We must ensure that we use these and all public funds in a responsible and lawful manner, ensuring value for money.

You must only spend Council budgets or approve expenditure in line with the Council's Financial Regulations and Procedures, Contracts Handbook and Tenders and Contracts Regulations. You must only make decisions or approve expenditure if you have the authority to do so and in accordance with the Council's Schemes of Authorisation. You can find all of these in the ['Governance - the Right Thing' section of the intranet](#).

Anything that you write or produce at work (including research, reports, drawings and software) is the Council's intellectual property and should not be passed on to third parties. Similar principles apply to the copyright of Council publications. In the event of leaving the Council's employment you should not take the Council's intellectual property with you to a supplier/contractor organisation.

You must not use Council facilities or equipment including buildings, vehicles, and tools, for your personal or outside interests.

You must not take anything that belongs to the Council, including surplus equipment, material or food unless properly authorised in advance.

Take care to avoid waste, loss or damage to Council property.

See also the [Council's e-mail and computer usage policies](#)

## **16. Misusing your position**

The public place a high degree of trust in the Council and the people who work for it and it is very important that you do not misuse this trust or your position

Under the Bribery Act 2010 it is an offence to request, agree to receive, or accept a financial or other advantage intending that a relevant function or activity should be performed improperly as a result.

For example, you must not:

- Use your position to give anyone an advantage or disadvantage.
- Accept or give a financial or other type of bribe or inducement
- Favour friends, family or current or past colleagues when making a job appointment or awarding a contract – this must be done on merit. In terms of recruitment processes if a member of your family, a friend, applies for employment with the Council you should declare the conflict of interest and not take any part in the recruitment process at all
- Try to influence councillors or MPs (including regarding job appointments).
- Deal with, or make a decision on, any application from someone you are personally associated with (for example a planning application or council tax benefit claim).

## **17. Confidentiality and data protection**

The public trust us to keep their personal information safe and secure and not to use it unless we are authorised to do so.

The Council has a number of policies, procedures and processes that govern how it manages its information so that, as an organisation, it can comply with its legal, regulatory and operational requirements.

You have a responsibility to ensure that the Council meets these legal obligations including complying with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) when processing personal data as part of your job.

You must, therefore, make sure that you familiarise yourself with, understand and comply with the Council's policies regarding data and information, including its Workforce Data Protection Policy and any procedures applicable to your specific role. This includes undertaking relevant mandatory Information Management training. You can find the Council's policies on data protection on the intranet.

As well as understanding the points below, you should also make sure that you are aware of the [six principles of the Data Protection Act 2018](#), which imposes a legal duty on individuals to process data to ensure the rights of the Data Subject are not infringed.

Individuals who have access to personal data should at all times be aware of these and the [lawful basis](#) for using the data under their control. In particular:

- To access only data covered by the [Workforce Data Protection Policy](#) if it is needed for the work they do and that they have authority to access, that information. Data should only be used for the specific lawful purpose for which it was obtained;
- To only disclose data individuals (whether inside or outside the Council) where this is authorised;
- Not make any unnecessary copies of personal data;
- To keep data secure (for example by complying with rules on access to premises, computer access, including password protection, and secure file storage and destruction);
- Not to remove personal data, or devices containing or that can be used to access personal data, from the Council's premises without adopting appropriate security measures (such as encryption or password protection) to secure the data and the device;
- Never store personal data on personal devices;
- To use only your Council approved email account for email communications whilst working for the Council and not to send emails or transfer attachments using a personal email account;
- Always, lock drawers and filing cabinets. Never leave personal or valuable data unattended;
- Not to disclose personal data by discussing it where you can be overheard or processing data where it can be read easily by a third party;
- To dispose of personal data securely when finished with it by shredding or use of confidential waste bins;
- To report data breaches of which they become aware to the Information Management Team at [data.breach@croydon.gov.uk](mailto:data.breach@croydon.gov.uk) immediately;
- Understand the [Rights of Data Subjects](#) as to how their data can be accessed by them and the other rights that they have to control the use of their information;
- To ask for help if you are unsure about data protection or if you notice any areas of data protection or security which can be improved upon from the information management team at [information.management@croydon.gov.uk](mailto:information.management@croydon.gov.uk).

Further details about the Council's security procedures can be found in the information management policies on the intranet: <https://intranet.croydon.gov.uk/lbc-policy-manager/accesscontrol2.html>

Failing to observe data protection requirements may amount to a disciplinary offence, which will be dealt with under the Council's disciplinary procedure.

Significant negligent or deliberate breaches of Council policies, such as accessing employee or customer data without authorisation or a legitimate reason to do so, may constitute gross misconduct and could lead to dismissal without notice.

It is a criminal offence to conceal or destroy personal data which is part of a subject access request. This conduct would also amount to gross misconduct which could result in your dismissal without notice. Likewise under Section 170 of the Data Protection Act 2018 it is an offence for a person to knowingly or recklessly obtain or disclose personal data of another person without the consent of the Council. Where this occurs, the Council will refer the incident to the Information Commissioner's Office for investigation and possible prosecution.

## **18. Relationships with other people**

We expect you to have a professional and co-operative relationship with other people when you are at work, including elected members, colleagues, residents, suppliers and organisations that we work with.

There are some particular rules about how we work with different groups of people:

### **Residents, clients and service users**

- You must always be courteous, efficient and impartial when dealing with individual people or groups.
- You should avoid developing inappropriate personal relationships with residents, clients and service users, especially if they are considered vulnerable, even if this is with the best intentions. This could be giving them money or gifts, showing them preferential treatment, or having an intimate relationship.

### **Elected members**

The relationship between Members and staff is important to the successful working of the Council and we expect you to follow the [Protocol on Staff-Councillor Relations](#) (which can be found on the external [council website](#)). In addition:

- You must declare any personal relationships with elected members via a [declaration of interest](#).
- You must provide balanced advice to members or political groups and not let your own political opinions affect this.
- You should avoid over-familiarity with members so that your approach or political balance is not called into question.
- You must not approach elected members about personal employment issues.

You must also not let your personal political views affect your work, in how you provide services to residents, or your relationships with colleagues.



## **Contractors and suppliers**

- You must declare [via a declaration of interest form](#) if you have a private or business relationship with any of our contractors or suppliers and complete a written declaration of interests.
- You must [declare in writing](#) if you (or a family member, friend or business associate) are part of a company or organisation submitting a tender to the Council.
- You must not disclose any information to any contractor or supplier unless authorised to do so.
- You must notify your manager immediately if you are approached by a contractor or supplier seeking unauthorised information or preferential treatment.

## **Colleagues**

Sometimes personal relationships develop in the workplace. You must make sure that they do not adversely affect the work that you do, the decisions that you make, or how you treat other colleagues.

- You must tell your manager or the Monitoring Officer about any relationship with a colleague that may impact, or be perceived to have an impact on your work.
- Relatives, spouses, partners, God Parents or close personal friends are not allowed to directly line manage each other or be involved in any employment issues or decisions about each other. If a relationship develops between a manager and a direct report this should be raised with the manager's manager and Monitoring Officer and alternative line management arrangements need to be put in place. This includes recruitment decisions, managing performance and appraisal, job evaluation, restructuring, disciplinary and grievance issues, or authorising expenditure.
- You must appoint people based on merit and not their relationship with you.
- You must not canvass for a job on behalf of a friend or family member.
- You may not sit on the interview panel for a family member or a personal friend.
- If a candidate is known to you other than as a work colleague, you should inform the panel and seek advice on how to proceed.

## **19. Use of social media**

The communications and social media tools that the Council provides are intended for Council business only, except for during your break periods where you may make limited personal use of sites like Facebook and Twitter and access personal emails. We monitor the Council's internet and email facilities to check that they are being used properly. The Council reserves the right to access any information on its systems or networks at any time which is all the property of the council.

Information that you publish on social media sites (whether at home or at work) can be seen to represent the Council or affect the Council's reputation. You should ensure that information you publish, or which is published through accounts you are responsible for, does not:

- Publish confidential information.
- Publish information that is Council property.
- Say that you work for the Council in a way that is not true.
- Publish the personal information of a third party without the necessary consent.
- Make negative comments about the Council, colleagues, customers or anyone else linked to the Council.
- Make offensive, defamatory or discriminatory remarks.



- Display offensive photographs or images.
- Express political views
- Express view that are contrary to Council policy
- Use social media to bully or harass colleagues (cyberbullying).
- Publish images of colleagues without their permission.
- Publish anything else that may adversely affect the Council's reputation.

## **20. Contacting and responding to the media**

The Council's public image and reputation is affected by how it is presented in the media. The Council has a communications team whose responsibility is to manage the Council's reputation with the media and make or publish official comments on behalf of the Council.

Members of staff are not permitted to discuss Council issues with the media or provide them with information or documents without the permission of the Chief Executive or your Corporate Director or Director. This applies to electronic media, such as commenting on social networking sites or blogs, as well as press, radio and TV.

Staff side leads from the trade unions are permitted to speak directly to the media only on the union's behalf.

You must also not publish information in your own right which is against the Council's interests or defamatory of elected members, colleagues, people or organisations that we work with.

All media enquiries must be referred immediately to the Council's communications team. If you are aware of an issue which will cause media interest or are told that someone intends to contact the media about the Council or its services, you should immediately inform your manager and a member of the communications team.

## **21. Your personal affairs**

Your personal affairs or financial circumstances may affect how you work or behave or have an impact on the Council.

### **Financial Responsibilities**

- You must not do anything that defrauds the Council or deliberately stops it getting income that it is entitled to.
- You must not fall into unmanaged debt to the Council. This would include but is not limited to, rent arrears, council tax arrears, parking fines, arrears arising from leaseholder arrangements with the Council, arrears in the repayment of employee loans. You must tell us and make arrangements to pay back the money you owe in a timely manner. Where any such arrears have been accrued prior to employment with the Council, and are still outstanding, employees should undertake to clear them within an agreed and reasonable period of time.
- If you leave Council employment any outstanding payment arrears will be taken from your final salary. If your final pay is insufficient to cover the sums owed to the council, you will need to enter into a debt repayment plan with the Council for the repayment of all sums owed.

- You should check your pay when you receive it and let your manager and the payroll team know about any problems or inaccuracies (including your personal information and tax code).

### **Carrying out other work**

Should you wish to take on any kind of additional work, paid or unpaid, you must inform your director beforehand in writing. You must comply with the requirement to make a formal declaration of interests, as set out above. In general, you can do other work, in addition to your Council role as long as:

- It does not conflict with your Council role.
- It is not during your Council working time or when you are on sick leave.
- It is not seen to be against the interests of the Council.
- It does not affect your ability to do your Council job.
- What you are doing does not damage the Council's reputation, or reduce public confidence.
- The **total** amount of work that you do does not exceed the hours set out in the Working Time Regulations.
- It does not put you in a position where you are competing with the Council for work or contracts.
- You do not use Council resources, material or information (for example IT equipment, photocopiers, postage, phone calls, e-mail).
- You do not use your position with the Council for private gain.
- You tell your other employer that you also work for the Council.

If you do undertake work outside the Council, you must not use the Council's facilities for that work.

## **22. Alcohol and drugs**

In order to provide the best possible services to and support the wellbeing of our staff the Council has a clear position on the use of alcohol and drugs:

- If you use, or are in possession of illegal drugs at work, you will be subject to disciplinary action and reported to the police.
- If you arrive for work smelling of alcohol or drugs we may take disciplinary action.
- You may not consume alcohol at work (unless it has been approved for a work event).
- If you use drugs, alcohol or other substances outside of work, this must not affect your ability to do your job or damage the Council's reputation.

For more information see the Council's [drug and alcohol policy](#) on the intranet. It is your responsibility to report any suspicions about colleagues drug or alcohol use at work to your manager.

## **23. The role of the Monitoring Officer**

The Monitoring Officer is responsible for making sure that Councillors and officers act with propriety and within the law. This person has a statutory responsibility to produce a report to full Council in the event of any possible illegality, maladministration or injustice coming to

their attention. The Monitoring Officer in the London Borough of Croydon is the Director of Legal Services.

## **24 Where to get help and further information**

If you have any questions about this code of conduct, or advice about a particular situation you should first of all speak to your Head of Service. In some cases you need to speak or seek approval directly from your Director, Corporate Director or the Chief Executive.

Further help and guidance can be found in the following documents on the Council's intranet:

- Customer Commitment
- [Alcohol and drugs policy \(module 11, chp6 in HR handbook\)](#)
- [Employee Grievance Procedure \(module 13, chp1 in HR handbook\)](#)
- [Protocol on Staff – Councillor Relations](#) (on the external website)

In the [Governance - the right thing](#)” section of the intranet you will find the Council's policies, procedures and guidance on:

- [Gifts and hospitality](#)
- [Expenses \(also module 05, chpt 6 in HR Handbook\)](#)
- [Whistleblowing \(also module 13, chpt 2 in HR Handbook\)](#)
- [Declarations of interests](#)
- [Nolan Principles](#)
- [Anti-Bribery](#)
- [Scheme of Delegation](#)
- [Financial regulations](#)
- [Purchasing, procurement, tendering and contracts.](#)
- [Information management and data loss](#)
- [Acceptable use of email and internet \(also module 18, chpt 2 in HR Handbook\)](#)

End

---

## Appendix A: The Seven Principles of Public Life

These principles (also known as the Nolan Principles) are:

### **Selflessness**

Holders of public office should act solely in terms of the public interest.

### **Integrity**

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must disclose and resolve any interests and relationships.

### **Objectivity**

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

### **Accountability**

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

### **Openness**

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

### **Honesty**

Holders of public office should be truthful.

### **Leadership**

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

## Appendix B: Standards of behaviour at work

We have standards of behaviour which we expect from you. These help make the Council a good place to work and ensure that colleagues and customers feel welcomed and valued. We also expect you to comply with the Council's commitment to equality.

The Equality Act 2010 imposes positive duties on local authorities to promote equality and to eliminate unlawful discrimination and harassment. Under the Act Croydon council may be liable for any discriminatory acts which you commit.

Officers are expected to uphold Section 149 Equality Act 2010:

- (a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

People working for the Council and our customers are entitled:

- To be treated with dignity, respect, courtesy and fairness.
- Not to be bullied, harassed or victimised.
- Not to experience any form of unlawful discrimination.

By law they are protected from discrimination on grounds of:

- Race
- Sex
- Disability
- Religion or belief
- Age
- Sexual orientation
- Gender reassignment
- Pregnancy or maternity
- Being married or in a civil partnership.

These are called 'protected characteristics' and they are referred to in the more detailed guidance below.

We will not tolerate unfair, offensive or unlawful discriminatory behaviour. It may be regarded as a serious disciplinary offence, which could lead to dismissal.

Discriminatory, unacceptable or offensive behaviour can take many different forms. Remember that your colleagues or customers may have different standards to you and may be offended or feel harassed by behaviour that you think is acceptable.

If you feel that you have been subjected to this sort of behaviour you should first of all discuss this with the other person or your manager and try and resolve it informally. If this is not possible or appropriate you should use the Council's Grievance procedure.

The next pages set out what we consider to be:

- Discrimination

- Bullying/harassment
  - Unacceptable or offensive behaviour
- All of these fall below the standards of behaviour that we expect.

## Discrimination

Discrimination can take a number of different forms.

Some of these are unlawful under the Equality Act 2010. Others may not be unlawful if the employer can demonstrate that they are **objectively justified**. This is a legal term where employers can prove there is a legitimate basis for treating an individual or group differently to others. The different forms of discrimination are:

- Treating someone worse than someone else because of a protected characteristic (this is called **direct discrimination**).
- Applying a practice or policy which disadvantages a person or people who share a particular protected characteristic (**indirect discrimination**).
- Treating someone worse than someone else because you think they have a protected characteristic, whether they do or not (**perception**).
- Treating someone worse than someone else because they are **associated with** a person who has a protected characteristic.
- Treating someone **unfavourably** because of something arising as a result of their disability. This is called **discrimination arising from disability**.
- Failing to make reasonable adjustments in the workplace so that a disabled person is not at a substantial disadvantage when carrying out their job.
- Treating someone unfavourably because of absence due to pregnancy, pregnancy-related sickness or maternity leave, or because they are undergoing gender reassignment.
- Treating a person badly or **victimising** them because you think that they
  - Have complained about discrimination.
  - Are going to complain about discrimination.
  - Have helped someone else complain.
  - Have done anything to uphold their own or someone else's equality law rights.

## Bullying and harassment

Bullying and harassment is any sort of unwanted behaviour that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.

Bullying can take the form of physical, verbal, and non-verbal conduct but does not need to be related to protected characteristics. Bullying behaviour may be in person, by telephone or in writing, including emails, texts, or online communications such as social media. The standards of behaviour expected are the same, whether you are expressing yourself verbally or in writing.

**Examples of bullying** include but are not limited to:

- verbal abuse, such as shouting, swearing, threats, insults, sarcasm, ridiculing or demeaning others, inappropriate nicknames, or humiliating language, including gossip
- Non-verbal behaviour and micro aggressions such as inappropriate eye contact.
- physical or psychological threats or actions towards an individual or their personal property

- practical jokes
- overbearing or intimidating levels of supervision, including preventing someone from undertaking their role or following agreed policies and procedures
- inappropriate comments about someone's performance
- abuse of authority or power, such as placing unreasonable expectations on someone in relation to their job, responsibilities, or hours of work, or coercing someone to meet such expectations
- ostracising or excluding someone from meetings, communications, work events or socials
- sending, distributing, or posting detrimental material about other people, including images, in any medium
- smear campaigns.

### **Preventing bullying behaviour from developing**

Ideally, a culture of honest and clear communication should be sought, with respect for the individual and for the confidentiality required when managing individual performance-related issues.

You also need to be mindful that colleagues can come from a wide range of backgrounds and may have been part of workplaces where the culture and expected standards are very different from what is expected in the council; as a result, you may not be aware of the impact that your communication has on others.

Early discussion about emerging issues is important to help avoid matters escalating and help establish more effective working relationships for the future.

### **Harassment**

The Protection from Harassment Act 1997 defines harassment as conduct that causes alarm or distress or puts people in fear of violence and must involve such conduct on at least two occasions. It can include repeated attempts to impose unwanted communications and contact upon a person in a manner that could be expected to cause distress or fear in any reasonable person.

Like bullying, harassment can take the form of physical, verbal, and non-verbal conduct but does not need to be related to protected characteristics. Harassment may be in person, by telephone or in writing, including emails, texts, or online communications such as social media. It may manifest obviously, or be hidden, or insidious.

**Examples of harassment** include but are not limited to:

- sending unwelcome emails
- unnecessarily repetitive, intrusive questioning
- unwelcome physical contact such as touching or invading 'personal space'
- haranguing
- intimidation
- inappropriate remarks or questioning such as comments about someone's appearance, lewd comments, and offensive jokes
- overbearing or intimidating levels of supervision, including preventing someone from undertaking their role or following agreed policies and procedures
- inappropriate comments about someone's performance

- placing unreasonable expectations on someone in relation to their job, responsibilities, or hours of work, or coercing someone to meet such expectations
- sexual harassment.

All forms of bullying and harassment are unacceptable and we will take firm action against them.

### Unacceptable or offensive behaviour

There is no definitive explanation of what constitutes unacceptable or offensive behaviour. The impact of unwanted conduct as perceived by the victim is more important than the perception of the harasser and their intent. Whether it is reasonable for the victim to feel the way they do is also taken into account.

Unacceptable or offensive behaviour can include:

- Any unwanted, unwelcomed and unreciprocated behaviour which undermines someone's dignity/feelings at work.
- Behaviour which might unreasonably threaten someone's job security or promotion prospects.
- Behaviour which creates an intimidating working environment, such as:
  - Actions, jokes, mimicking, or suggestions which might create a stressful working environment.
  - The production, distribution, display or communication and discussion of material such as books, posters, magazines, newspaper articles, photographs, videos, computer generated imagery etc., which may give rise to offence.
- People in authority using their position to bully, abuse or harass others.
- People in authority assuming a threatening or intimidating management style.

If someone finds any behaviour towards them at work has overtones which they find reasonably offensive they have the right to have it stopped.

This behaviour can be from a work colleague, contractor, councillor or someone working with the Council.

Unacceptable behaviour does not include legitimate actions taken:

- By a manager to encourage a worker to perform their duties or manage their performance.
- Within disciplinary or other formal procedures.

The following examples are a guide to help you understand what behaviour could be unacceptable and deemed discriminatory or offensive, whether it is intentional or not.

There will be other types of behaviour which could be unacceptable or offensive, but we hope that this is a useful guide to the most common types.

Type	Description	Examples
<b>Sexual harassment</b>	Behaviour which has the purpose or effect of violating that person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. This means any harassing	Inappropriate gestures, leering, getting too close, unwanted physical contact, including touching, patting, pinching, brushing against another person's body, indecent assault, display of material with sexual overtones (even if not directed at the complainant), giving unwanted gifts, using suggestive language, making



Type	Description	Examples
	conduct based on gender or sexuality.	unwanted propositions, derogatory comments, ridiculing or name calling based upon sex, repeatedly asking for dates after being refused, banter of a sexual nature, telling sexually explicit jokes, using affectionate names, asking personal questions, using innuendos, sending offensive emails, text messages and social media content (including social media activity in and outside work)
<b>Racial harassment</b>	Behaviour which has the purpose or effect of violating that person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person due to their race, colour or country of origin.	Inappropriate gestures, facial expressions, mimicking accents, derogatory comments, ridiculing or name calling based upon race, display of offensive material (even if not directed at the complainant), threats or insults, racial abuse, telling racist jokes and banter, inappropriate nicknames, labels, assault, excluding from social functions or events, ostracising, sending offensive emails, text messages and social media content (including social media activity in and outside of work)
<b>Disability harassment</b>	Behaviour which is directed at any individual with a disability, or groups of disabled people, which has the purpose or effect of violating that person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person due to their disability	Inappropriate gestures, mimicking, derogatory comments based upon a disability or reasonable adjustments that are in place, ignoring wishes or feelings, ostracising, staring, laughing at a disability, intrusive or inappropriate questioning, personal questions, telling jokes that are based upon a disability, patronising comments, inappropriate nicknames, excluding from social functions or events due to a disability, removing or preventing access to reasonable adjustments, sending offensive emails, text messages and social media content (including social media activity in and outside of work)
<b>Religious belief harassment</b>	Behaviour which has the purpose or effect of violating that person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive	Inappropriate gestures, mimicking, derogatory comments based upon religion or belief, making jokes or derogatory comments regarding religious dress (e.g. skull cap, turban, hijab), criticism of religious practices e.g. for taking time off

Type	Description	Examples
	environment for that person due to their religion or belief	to observe religious holidays, offensive name calling, assault, excluding from social functions or events due to religion or belief, display of offensive material relating to religion or belief, sending offensive emails, text messages and social media content relating to religion or belief (including social media activity in and outside of work).
<b>Equality-related conflict</b>	<p>The Council recognises that people have the right to observe different religions and beliefs and will make reasonable provisions to help employees practice their religion or belief e.g. through flexible working hours and providing a quiet area for prayer.</p> <p>Practicing a religion or belief at work in a way that may cause offence or treats people differently because of their protected characteristic is unacceptable and may also be unlawful.</p>	<p>An employee shares a workstation with a gay man who openly discusses his relationship with another man. The employee tells the gay colleague that her religion regards such behaviour as sinful and contrary to the laws of her God. Such a comment may be discriminatory towards the gay man.</p> <p>Some individuals may be guided by their religion or culture not to shake hands as a greeting. To avoid causing offence individuals should ensure that they greet all people in the workplace in the same way, irrespective of their race, gender, age, religion, sexual orientation etc.</p> <p>A counsellor declines to provide a service to a same-sex couple on the grounds that such relationships are immoral according to his religion. Such behaviour conflicts with the Council's statutory duty to eliminate discrimination and promote equality and is not acceptable.</p>
<b>Age harassment</b>	Behaviour which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person due to their age	Inappropriate gestures, mimicking, the display of material which is offensive in relation to age, excluding from social functions or events due to age, ostracising, making derogatory comments, ridiculing or name calling in relation to age, telling jokes and banter which are based on age, questioning ability based on age stereotypes, sending offensive emails, text messages and social media content relating to age (including social media activity in and outside work).

<b>Type</b>	<b>Description</b>	<b>Examples</b>
<b>Sexual orientation harassment</b>	Behaviour which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person due to their sexual orientation or perceived sexual orientation	Inappropriate gestures, mimicking, the display of material which is offensive in relation to sexual orientation, Homophobic abuse, threats, insults, ridiculing or name calling, jokes relating to sexual orientation, banter or derogatory comments in relation to sexual orientation, intrusive or inappropriate questioning, , , criticism or chiding on the grounds of belief (religious or other),ostracising, excluding from social events due to sexual orientation or perceived sexual orientation, sending offensive emails, text messages and social media content relating to sexual orientation (including social media activity in and outside work).
<b>Harassment related to gender identity or gender reassignment</b>	Behaviour which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person due to their gender identity or gender reassignment, to include non binary and gender neutral.	Inappropriate gestures, mimicking, the display of material which is offensive in relation to gender identity or gender reassignment, ostracising, excluding from social functions or events due to gender identity or gender reassignment, making derogatory comments, ridiculing or name calling in relation to gender identity or gender reassignment, telling jokes and banter in relation to a person's gender identity or gender reassignment, sending offensive emails, text messages and social media content relating to gender identity or gender reassignment (including social media activity in and outside work), deliberately or persistently 'misgendering' a trans person, deliberately or persistently 'deadnaming' (calling someone by their birth name after they have changed their name), threats or insults.
<b>Bullying/Singling out</b>	Bullying often results from a misuse of management power, but it can also be the misuse of any form of individual power, such as physical strength, personality or age or collective power through strength of numbers. More than a strong or authoritarian management style, it is destructive rather than constructive, it is criticism of a person rather	Ostracising/freezing out, withholding essential information, resources or training, setting impossible tasks or deadlines, over demanding requirements, needlessly changing priorities or objectives, unreasonable allocation of duties, deliberate wrongful attribution of blame, shouting, swearing, abuse, nicknames, malicious gossip, public reprimanding or humiliation, belittling, sarcastic or patronising comments, persistent reminders of past failures, excessively tight supervision,

Type	Description	Examples
	than their mistakes, it publicly humiliates rather than privately corrects them and it results in them feeling threatened or compromised.	unnecessary phone calls to someone's home, hitting or grabbing a person, pushing, jostling, practical jokes, initiation ceremonies, damaging or stealing property.
<b>Victimisation</b>	Where a person is subjected to a detriment because he/she has brought proceedings, given evidence or information, or complained about the behaviour of someone who has been harassing, discriminating against, or in some other way intimidating them.	A worker helps a colleague with a sexual harassment grievance against another worker. Because of this, their manager marks them down at their annual appraisal on the basis they are 'not very loyal'.

### Taking action or making a grievance:

**If you are personally subject to behaviour** which is against these standards:

- Discuss it with the person concerned to try to resolve the issue informally and discuss the matter with your manager.
- If you do not feel that this is possible or appropriate, or you are unsatisfied with the response you may raise a grievance through the Council's [employee grievance procedure \(module13, chp1, HR Handbook\)](#)

We will take your grievance seriously and investigate it. Disciplinary action may be taken if the allegation is proven.

**If you witness behaviour which is against these standards:**

- Firstly try to resolve the matter informally with the person concerned.
- If you do not feel that this is possible or appropriate you should raise the matter with a senior manager such as your Head of Service or Director.

### Responsibilities

The Council takes discriminatory, unacceptable or offensive behaviour extremely seriously. To ensure this, different people have different responsibilities:

**The Council will:**

- Review, revise, implement and monitor our policies and procedures.

**Elected members will:**

- Support the principles and practice of equality and diversity policies.
- Ensure that Council services are available to all members of the community.
- Treat all workers and customers with dignity and respect.

**The Chief Executive will:**

- Ensure the Council's commitments are communicated effectively.
- Require that senior management observes its responsibilities to ensure that behaviour towards staff does not involve any form of harassment or discrimination.

**Human Resources will:**

- Provide specialist advice and arrange training for managers and staff.
- Set guidelines for implementing employment aspects of equalities and diversity policies.

**Senior managers will:**

- Communicate the Council's commitment to equalities and diversity to all staff.
- Ensure that they and their staff comply with the Council's standards of behaviour.
- Ensure that all managers apply policies and practices fairly and consistently.
- Provide services that are available to all members of the community.
- Take speedy and appropriate action to deal with unacceptable or offensive behaviour.

**All managers will:**

- Treat all those working for the Council and customers with dignity and respect.
- Be alert to and take action to correct unacceptable behaviour within the workplace
- Ensure all workers and volunteers are aware of the standards of behaviour that the Council expects of them.
- Make sure all workers and volunteers know how to raise issues.
- Support workers if they witness unacceptable behaviour by customers by explaining politely but firmly that such behaviour is unacceptable.
- Deal with any grievances or allegations which come to their attention appropriately, effectively and confidentially, respecting the rights of all relevant parties.
- Ensure that people who make a grievance are appropriately supported in doing so.

**Everyone who works for the Council is responsible for:**

- Understanding the standards of behaviour that the Council expects of them.
- Making sure that their own conduct does not fall below those standards of behaviour.
- Standing up to behaviour that they find unacceptable.
- Supporting colleagues who are being harassed, bullied, victimised, or being discriminated against.

---

End

---

## Appendix C: Standards of appearance at work

How you look and dress at work has an impact on how people view the Council and inappropriate dress can suggest that staff have little regard for their service delivery or their customers.

It is therefore important that staff are clear about what is expected from them in how they dress for work.

### Standards of appearance

The Council expects all staff to:

- Have a high standard of appearance and personal hygiene.
- Choose professional and appropriate clothing for the work you are doing.
- Avoid any clothing with political or offensive messages.
- Display a visible Council identification badge when at work, unless your Head of Service has agreed that you do not have to wear one.

Staff working in an office environment are expected to

- Wear formal or informal office dress, depending on their work that day.
- Wear formal office dress when meeting visitors or people from other organisations.
- Wear suitable footwear, both in terms of appearance and in ensuring their safety and wellbeing.

Staff issued with uniform or protective clothing officers are expected to:

- Wear only protective clothing or uniform authorised or owned by the Council.
- Keep their clothing clean, presentable and in good repair.
- Prevent anyone else from wearing their uniform or protective clothing.
- Return their protective clothing to the Council when they leave.
- Make any alterations for religious or health reasons only after agreement with their manager.
- Avoid wearing their Council clothing outside work hours, except when they are travelling to and from work.

### What you can expect from the Council

Staff can expect the Council to have a flexible and professional approach to the standards of dress at work which recognises that:

- Different types of dress (e.g. protective clothing, uniforms or formal business wear) are needed or appropriate for different types of work.
- Our employees come from a large range of backgrounds, cultures and ages with different preferences and styles of dress.
- Adjustments may sometimes be necessary due to health, disability, cultural or religious considerations.
- In some circumstances casual clothing may to be worn at work, for example:
  - When attending work social events or preparing for accommodation moves/housekeeping.
  - When participating in exercise before and/or during the working day, bringing a change of clothing, as appropriate
  - Where there is a local agreement that the use of casual clothing and/or sportswear improves accessibility with service users.
  - When attending some off site training courses.

If we consider that your appearance is not acceptable, we will tell you. If you do not make the improvement required we may then follow our disciplinary procedures, which you can find on the Council's [HR Handbook](#), module 11, Chpt 2

End

---

