

# Code of Conduct

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# Introduction

- 1.1 Our ambition is to make Islington work well for everyone; working together for a more equal future where everyone can thrive. Achieving our shared ambition for a more equal future is not just about what we do, but how we do it. The code of conduct is designed to protect colleagues, residents and the reputation of the council.
- 1.2 The public expects us to demonstrate the highest standards of behaviour by following the Seven Principles of Public Life (also known as the Nolan Principles): integrity, objectivity, accountability, openness, honesty, leadership, and selflessness.
- 1.3 The code of conduct reflects our commitment to:
  - creating a high-performance workforce, empowered to deliver our purpose
  - creating an inclusive and equitable workplace, where everyone is treated with dignity and respect
  - our CARE values – we collaborate, we're ambitious, we're resourceful and we empower each other

# Purpose

- 2.1 The code of conduct outlines the behaviours and standards that are expected of us and the consequences if these standards are not met. This makes sure that:
  - we all understand the council's standards and what is expected of us
  - we all deal with difficult or potentially compromising situations in the right way
  - we all acknowledge our responsibility to uphold and promote high standards of behaviour throughout the council
  - that the public gets the best from council services
  - that the public is treated with respect, responded to promptly and has a say in the services provided
  - we can make the council and its services better for our residents
  - the public has trust in what we do and how we do it
- 2.2 The code will help guide you in your work, but it can't cover every possible situation. You must always be aware of your professional responsibilities and act appropriately and reasonably.
- 2.3 If you are unsure about the right action to take, consider asking yourself these questions:
  - is it legal?
  - is it ethical?
  - is it consistent with our policies and this code of conduct?

- would I be comfortable with my colleagues, manager, family or friends knowing about my decision?
- would I feel comfortable if it appeared in a newspaper or on social media?

2.4 If you are still unsure about what the right thing to do is, or if you have any questions about anything in this code, you can:

- refer to council policies, procedures, guidance or local requirements that apply to your role
- speak to your manager or another trusted manager
- get in touch with HR via AskHR (tel. 020 7527 6070)

## Who is the code for?

### **Everyone employed by the council**

3.1 The code of conduct applies to everyone who is employed by the council. The code is part of your employment contract, and you must follow it in all aspects of your work. It also applies to actions in your personal life that could affect your work, damage the council's reputation, or harm work relationships.

3.2 More detailed information about behaviour and ways of working are provided in the council policies, procedures and guidance referred to in the code. These are available on Islington Connect but if you need them in a different format, please ask your manager or get in touch with HR via AskHR (tel. 020 7527 6070).

3.3 The code will be given to existing colleagues and new colleagues when they start working with the council.

### **Managers**

3.4 The code applies to everyone employed by the council, including managers. If you manage or supervise people you must also:

- behave as a positive role model
- make sure your teams know the code, understand what it means for their roles and help them follow it
- make sure the ways you, and your team, work are in line with the code
- keep a record of any problems with behaviour or standards and address them as early as possible
- be aware of and follow the council's policies, procedures and guidance
- make sure that concerns raised are managed confidentially, fairly and without retaliation

## Other people covered by the code

3.5 Although the code is aimed at people employed directly by the council, we expect anyone carrying out activities or work for the council to follow the code including:

- consultants and their employees
- contractors and their employees
- the council's partners and their employees
- employees of other organisations who have been seconded to work for the council
- agency workers
- volunteers and people carrying out work placements, apprenticeships or similar roles

3.6 If the code is breached by anyone listed above the council will consider seeking compensation or ending the contract (or other arrangement). We will also consider referring the matter to the police or appropriate regulatory body.

3.7 The code applies to colleagues in education establishments if it is adopted by the governing body.

## What happens if you don't follow the code

4.1 It is your responsibility to read, understand and follow the code of conduct. If you don't follow the code, you may face disciplinary action up to, and including, dismissal. Please refer to the Disciplinary procedure for more information, including examples of misconduct and gross misconduct.

4.2 There may be times when it's appropriate for the council to take legal action, make a referral to the Police or another appropriate enforcement agency or make a referral to professional or regulatory body.

## Standards and service delivery

5.1 We are all expected to do our jobs to the best of our ability and behave in ways that create a positive image of the council so residents and businesses can have confidence in our services.

5.2 We are ambassadors for the council and must be professional, polite, competent, friendly, helpful and trustworthy. In all our interactions we must demonstrate our CARE values to make sure we deliver the best services for residents.

5.3 As public servants we must take care of public resources and property effectively, sustainably and with complete honesty.

## **High standards**

5.4 You must:

- give the highest possible standard of service to the public and make service delivery your main priority
- not do anything inside or outside working hours which could undermine public confidence in the council or yourself as a council employee
- work in the best interests of the council and the community we serve
- not withhold payments or revenue owed to the council (or any other public authority) such as rent, council tax, or overpayment of salary/wages (see also personal financial affairs section)
- follow council policies and procedures, and meet the standards set by your manager, Head of Service or Director

## **Honesty and integrity**

5.5 Colleagues must behave honestly and act with integrity in their work. You must:

- be truthful and not provide false or misleading information
- not destroy or alter information or records without authorisation
- not withhold information or conceal matters which you should reasonably be expected to disclose
- not misrepresent the council
- always use public money and resources with complete honesty

## **Attendance, availability and punctuality**

5.6 The council has guidance about how frequently you need to be in the borough, based on your job role. We call these our workstyles.

5.7 Managers must make sure colleagues are aware of their workstyle and any local arrangements including things like:

- working hours
- shift patterns
- break times
- ways of recording whereabouts / keeping in touch
- procedures for recording start and finish times

5.8 Whichever workstyle applies to your role you must:

- follow the local arrangements for your role
- be available and contactable while working

- arrive at your workplace on time at the beginning of your working day and after any breaks
- arrive on time for appointments, unless there are exceptional circumstances

5.9 If you are running late for work you need to tell your manager or another manager in your service.

5.10 If you can't be at work because you are unwell or injured, you need to tell your manager, or another manager in your service, before your normal start time or as soon as possible. You must follow the sickness absence procedure.

### **Additional jobs and other activities outside work (paid or unpaid)**

5.11 You must not do any other work during the hours you work for the council, whether it's paid or unpaid. This includes extra paid work, freelance or self-employed work or unpaid voluntary work. This also applies when you are on sick leave, special leave or if you are suspended.

5.12 Any additional employment or voluntary work outside the council must not, in the council's view, conflict with the council's interests or have a negative effect on the council's reputation.

5.13 You must complete a declaration of interest form if you have any other jobs outside of the hours that you work with the council so that your manager can consider if there are any concerns about conflict of interest or working time. This includes extra paid work, freelance or self-employed work or unpaid voluntary work.

5.14 You must make sure that your total working hours allow for enough rest to look after your wellbeing and so that you are able to carry out your work for the council to the best of your ability.

5.15 If you work with or serve on any council-funded voluntary organisation you must report this via the declaration of interest form, in line with the Declaration of Interest procedure.

5.16 See also conflict of interest section.

### **Breaking the law**

5.17 Breaking the law, either criminal or civil, at work or away from work could damage public confidence in the council and could make you unsuitable for the job you do.

5.18 You must tell your manager immediately and complete the self-disclosure form if you:

- are under police investigation
- are arrested
- are charged with a criminal offence
- receive a caution, reprimand or warning

5.19 This applies to all criminal matters whether they are related to work or not.

5.20 You must tell your manager if you are the subject of any other investigation or proceeding that may have a negative effect the reputation of the council or impact on your job role. For example, a colleague working in Finance who is declared bankrupt or a children's social worker whose child is the subject of a childcare order.

5.21 You must tell your manager, Director or Head of Service if you know of any criminal activities your colleagues have committed in the course of their employment.

5.22 As a manager you must consider whether the situation, including the actions leading up to it, risks the reputation of the council, damages confidence in the colleague or makes them unsuitable to carry out their role. You must contact your Employee Relations Specialist for advice.

## **Dress**

5.23 How you present yourself at work directly affects the image of the council and your service and must be appropriate for the work you are carrying out for the council.

5.24 You must:

- always be clean, tidy and presentable
- follow the requirements of local managers in relation to appropriate dress for your service and work role
- always wear uniform or protective clothing if these have been issued, or made available for tasks, and make sure these are clean and in good repair
- always have regard to the health and safety implications of what you wear e.g. the need for safe footwear

5.25 You may follow the traditions of your ethnic, cultural or religious background if it is safe and appropriate to your work role. You must discuss this with the appropriate managers to make sure there are no health and safety implications.

## **Name badges**

5.26 You must always wear your name badge at work unless your manager has agreed that you may carry it instead.

## **Driving**

5.27 If you must drive as part of your work, you must:

- avoid making unnecessary and short journeys by car or van; it is better for the environment to use public transport, cycle or walk
- always drive courteously and according to the laws and rules of the road
- comply with the council's policy on alcohol, drugs and substance misuse
- never drive having taken prescription, or over the counter drugs, if there is a risk that your ability to drive could be affected

- always make sure that vehicles are roadworthy, safe to drive, well-maintained, properly insured and taxed, and suitable for their intended use
- immediately tell your manager if you are stopped by the police whilst driving a council vehicle
- immediately tell your manager if you are involved in a road traffic accident and report through the incident management system while working or driving to and from work
- immediately tell your manager if you receive any penalty points, speeding offences or driving bans
- avoid getting a parking ticket while working, and let your manager know if you get one
- have regular eye tests and tell your manager about any health issues which may affect your driving
- comply with the council's Corporate Core Fleet and Driver Policy

This section explains the rules and responsibilities for staff who drive as part of their job, including driving safely, following legal requirements, keeping vehicles in good condition, and reporting any driving-related issues to their manager.

## **Smoking and vaping**

5.28 You must follow the council's Smoke Free Policy.

## **Alcohol and drugs**

5.29 You must:

- not drink alcohol or use drugs (except prescribed or over-the-counter medications) during working hours, including lunch breaks or any other breaks, or work under the influence of drugs or alcohol
- consult your GP for advice on the effects any legal medication may have on your ability to perform your role or conduct yourself at work and tell your managers accordingly
- tell your manager, Director or Head of Service if you have genuine reason to believe that a colleague may have an alcohol, drug or substance misuse problem
- comply with the council's policy on alcohol, drugs and substance misuse

5.30 If you think you have an alcohol, drug or substance misuse problem you can seek support through the employee assistance programme.

## **Health and safety**

5.31 You have a legal duty to take reasonable care of your own health and safety and the health and safety of others.

5.32 You must:

- make sure you do your work safely and correctly, following appropriate risk assessments and considering your health and safety as well as the health and safety of your colleagues and the public
- be familiar with health and safety law, which is displayed in all workplaces, and the council's Health and Safety Policy Statement
- follow the health and safety instructions and regulations relating to the tasks you are carrying out
- complete the health and safety training for your job which the council provides

5.33 Managers must make sure that colleagues work in a safe place, with safe systems of work and must be familiar with the council's Health and Safety Policy Statement and their responsibilities within it. Managers must also support their team members completion of their health and safety training.

5.34 If you are a Director, you may face personal liability for breaches under section 37 of the Health and Safety at Work etc. act 1974.

### Personal financial matters

5.35 You must:

- manage your personal finances honestly and lawfully and not do anything that defrauds the council or any other public authority. This includes making sure you are registered for council tax, not claiming housing benefit or universal credit unless you are entitled to, and only applying for and living in a council property if you are entitled to
- keep up to date with council tax, rent and service charges due to this and any other council. The council will use any powers available to it to reclaim money, including deducting money from earnings
- avoid being the subject of legal action which may bring the council into disrepute or undermine the relationship of trust and confidence between yourself and the council

5.36 You need to be aware that:

- employment and payroll data held by the council may be used to find employees with debts to the council, including rent, commercial rent, council tax, leasehold service charges, business rates, right-to-buy insurance, housing benefit etc.

## Behaviour at work and outside work

6.1 The way you behave directly affects you, your colleagues, your service, the workplace, and the public's perception of the council.

6.2 We are all responsible for making our workplace safe, welcoming, respectful and inclusive; where people feel comfortable to come to work and deliver for our residents.

6.3 The Public Sector Equality Duty means we have a legal responsibility to make sure that we promote equality in every aspect of what we do. We must:

- put an end to unlawful behaviour that is banned by the Equality Act 2010, including discrimination, harassment and victimisation
- advance equal opportunities between people who have a protected characteristic and those who do not
- foster good relations between people who have a protected characteristic and those who do not

6.4 You must:

- always treat the public and colleagues with dignity and respect and behave in a way which cannot reasonably cause offence
- be considerate of others and be aware of how your behaviour affects others
- exercise self-control and never behave in a loud, intimidating, aggressive or angry manner
- not swear or use abusive, threatening or discriminatory language
- tell your manager or another trusted manager about anything which may be discrimination, bullying, harassment, microaggressions, coercive control or victimisation – whether it is happening to you, a colleague, or a member of the public

6.5 If you are a manager, you must also make sure that:

- services are delivered in a way which effectively meets the council's equality policies and that all groups within the community have equal access
- colleagues can enjoy a working environment which is free of any discrimination, bullying or harassment
- you tell your Director or Head of Service about any incidents and/or complaints about discrimination, bullying, harassment, microaggressions, coercive control or victimisation

This section explains that everyone in the workplace must act respectfully and responsibly to create a safe, inclusive, and welcoming environment, following legal duties to promote equality, prevent discrimination, and report any concerns about unfair treatment or inappropriate behaviour.

## **Equalities, discrimination and harassment**

6.6 We are dedicated to working together to create an inclusive and fair working environment. We want a workplace where everyone is empowered to thrive by being treated fairly, with dignity and respect; free from discrimination, bullying and harassment.

6.7 Proven allegations of discrimination, bullying and harassment, including sexual harassment and microaggressions may result in disciplinary action. Aggravating factors,

such as abuse of power over a more junior colleague, will be considered when deciding what disciplinary action to take. We will not tolerate retaliation against anyone who raises concerns in good faith.

6.8 You must:

- make sure that the council's equalities statement, policies and guidelines are followed
- treat all colleagues and members of the community fairly and equally without discrimination in line with the Equality Act 2010
- assist all members of the community so that they can benefit from the services on offer
- not say things or display materials that are sexist, misogynistic, racist, ableist, homophobic, bi-phobic, transphobic, ageist, Islamophobic, antisemitic or otherwise disrespectful or offensive because of someone's religion, culture or ethnicity
- not harass anyone by violating their dignity or by creating an intimidating, hostile, degrading or offensive environment

### **Sexual harassment**

6.9 You must not sexually harass anyone; it is unlawful and will not be tolerated. The Worker Protection (Amendment of the Equality Act 2010) Act 2023 details our responsibility to prevent sexual harassment. Examples of sexual harassment include:

- making sexual remarks about someone's body, clothing or appearance
- sexual comments, innuendos or jokes
- making sexual comments or jokes about someone's sexual orientation or gender reassignment
- displaying or sharing pornographic or sexual images, or other sexual content
- unwanted sexual advances or flirting
- spreading sexual rumours
- non-verbal behaviours such as suggestive staring or gestures
- repeatedly asking someone to socialise or go on a date after they have made it clear they are not interested
- microaggressions such as saying that having a tattoo; a piercing; wearing certain clothes or make-up; makes someone open to sexual advances or 'up for anything'
- unwanted physical contact of a sexual nature i.e. brushing up against someone, hugging, kissing or massaging them
- asking questions about someone's sex life
- sexual assault or rape

## **Bullying**

6.10 You must not bully anyone; it will not be tolerated. Bullying is behaviour that is either offensive, intimidating, malicious, insulting or an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone.

6.11 Examples of bullying include:

- spreading malicious rumours about someone
- verbal abuse such as shouting or swearing at someone
- nonverbal behaviours such as offensive gestures
- deliberately giving someone a heavier workload than everyone else
- providing too much unnecessary supervision (micro-managing)
- unconstructive criticism
- purposefully ignoring/isolating someone
- teasing or making someone the target of pranks or practical jokes
- putting humiliating, offensive or threatening comments or images on social media
- sexist or misogynistic behaviour
- microaggressions such as telling someone 'you don't act gay' or asking someone 'where are you really from?' when they say they are British
- sharing personal information about someone's sexuality, gender identity or trans status without their consent, otherwise known as 'outing' someone
- sharing personal information about someone's disability or long-term health condition without their consent
- passive-aggressive behaviour which involves indirect hostility including backhanded compliments, sarcasm or making comments or jokes which are designed to undermine someone's credibility

6.12 See the guidance available on Islington Connect, or ask your manager for a copy, for further information about bullying, harassment, sexual harassment, microaggressions and coercive control.

## **Personal use of social media**

6.13 What you publish on social media can be seen to represent the council and can affect the council's reputation. Your online behaviours should reflect the same standards of respect and professionalism expected in the workplace. You must not engage in activity that might bring the council into disrepute.

6.14 You must follow the Personal use of Social Media policy. This is available on Islington Connect, or you can ask your manager for a copy.

## **Approaching challenging situations**

6.15 As a colleague or a manager, you may sometimes need to deal with conflict or challenging situations in the workplace. Conflict is a normal part of working with others which, when addressed early and effectively, can lead to better solutions, greater understanding of each other and stronger teams.

6.16 When appropriate, try and resolve issues by:

- engaging in respectful, direct dialogue to resolve differences
- addressing issues early to try and resolve the problem before it escalates
- using informal methods, such as check-ins, to address and resolve issues

6.17 When it's not appropriate or safe to try and deal with an issue on your own you should speak to your manager, another trusted manager or your Employee Relations Specialist.

6.18 For more information, please see our resolving concerns and creating a safe workplace page on Islington Connect.

## Communication

7.1 Clear, respectful, honest and empowering communication helps us collaborate with our colleagues, councillors, partners and the public. Good communication is one of the most essential ingredients of providing effective public service.

7.2 You must make sure that your communications are:

- honest
- effective
- polite
- respectful
- clear
- considered
- accessible
- in line with council values

7.3 You must follow council policies about mobile devices, email, telephones and digital systems including the IDS Acceptable Use policy.

7.4 Colleague names, job titles and service areas will be available to the public.

7.5 Communications may be intercepted where appropriate. This may include monitoring (and recording) of telephones, the internet, e-mail, texts and instant messaging.

## **Giving information to the media**

7.6 You must not communicate directly with journalists or the media (e.g. national and local newspapers, press agencies, radio, television stations, professional journals, websites, blogs, podcasts, social media platforms) about your work or council matters, unless you have been authorised to by the Communications and Campaigns service.

7.7 If you are approached by the media, you must immediately refer this to [media@islington.gov.uk](mailto:media@islington.gov.uk).

## **Corporate social media channels**

7.8 You must not set up or use social media accounts that are intended to communicate as Islington Council or any council service without authorisation from the Communications and Campaigns service. [communications@islington.gov.uk](mailto:communications@islington.gov.uk)

7.9 Nothing in this section prevents senior trade union officials from contacting the media in relation to appropriate trade union activities.

## **Political neutrality**

8.1 It is important that the public can trust the council to deliver public services fairly and act in the best interest of all residents, regardless of their political views.

8.2 It's also important that everyone can come to work to deliver for our residents and feel safe and comfortable doing this. See also Behaviour at work and outside work section.

8.3 You must:

- carry out your work in a politically neutral, impartial, way and must not allow your personal political views to interfere with your work
- serve the council as a whole and make sure that the individual rights of all councillors are respected
- give advice to councillors, implement decisions and manage the day-to-day delivery of services in a way which does not compromise your political neutrality
- not use the workplace to promote or further personal political issues
- not wear or display anything that shows support for or opposition against any political or pressure group (unless your job requires you to run specific campaigns for the council). You can still wear or display trade union identification/membership
- be aware of and comply with the Member and Officer Protocol in the council's Constitution
- be aware of and comply with the council's Declaration of Interest procedure

## **Politically restricted posts**

8.4 Some posts in the council are politically restricted by law, or because they are politically sensitive. If you are employed in a politically restricted role, you are not allowed to have any active political role either in or outside work. You must follow the requirements in the council's constitution and the guidance on politically restricted posts.

# **Relationships**

9.1 You are expected to have professional and co-operative relationships with other people, including councillors, colleagues, residents, contractors or suppliers and organisations that you work with.

9.2 Managers must treat declarations of personal relationships confidentially and not share the information with anyone apart from people who need to be aware to help manage risks.

## **Relationships with residents, clients and service users**

9.3 You must always be polite, efficient and impartial when dealing with individual people or groups.

9.4 You must 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. An inappropriate personal relationship may include giving someone money or gifts, showing them preferential treatment, or having an intimate relationship with them.

9.5 You must tell your manager if you have a close personal relationship with a resident that you also provide services for so they can consider the impact and decide how to effectively manage this, in line with the Declaration of Interests procedure.

## **Relationships with contractors or suppliers**

9.6 You must tell your manager if you or a close relative has or has had, a personal or business relationship with an external supplier or potential supplier so they can consider the impact and decide how to effectively manage this, in line with the Declaration of Interest procedure and the Procurement Rules.

## **Relationships with councillors**

9.7 Close personal relationships with councillors should be avoided as they can damage your professional relationship and compromise your work.

9.8 You must tell your manager and the Monitoring Officer if you have a relationship with a councillor which might be seen as influencing your work. Your manager and the Monitoring Officer will consider the impact and decide how to effectively manage this, in line with the Declaration of Interests procedure and the Member and Officer Protocol.

- 9.9 You must never use a relationship with a councillor to influence the decisions or actions they make on behalf of the council or for your own personal benefit, inside or outside of work.
- 9.10 You must not approach councillors about personal employment issues.
- 9.11 If you have a complaint about how a councillor has behaved, you should follow the council's process for making complaints about councillors, which is set out in the Code of Conduct for Members.
- 9.12 This does not interfere with your rights, if you are an Islington resident, to correspond with your ward councillors or constituency MPs on ward and constituency matters.

### **Relationships with colleagues**

- 9.13 Colleagues who have close personal relationships, such as partners or family members, can work together. These relationships usually do not disrupt work, and it is generally assumed that performance will not be affected.
- 9.14 If you have a personal relationship with someone at work you must behave professionally and make sure the relationship does not affect your work, your decisions, or how you treat other colleagues.
- 9.15 You must tell your manager if you have a relationship with a colleague that may impact, or be seen to have an impact, on your work or your decision making so they can consider the impact and how to effectively manage this, in line with the Declaration of Interest procedure

### **Relationships between managers and colleagues**

- 9.16 Close personal relationships between managers and colleagues may compromise fairness and objectivity and can have a negative impact on morale in the workplace.
- 9.17 Relatives, spouses, partners, or close personal friends are not allowed to directly line manage each other.
- 9.18 If you are a manager and have a personal relationship with someone that reports into you, you must tell your manager so they can consider the impact and how to effectively manage this, in line with the Declaration of Interest procedure.

### **Recruitment, promotions and employment matters**

- 9.19 If you are involved in hiring new colleagues (including agency or interim workers) you must make sure you appoint them based on merit i.e. their ability and skills.
- 9.20 We want to avoid any accusations of favouritism or bias. You must not be involved in decision making about any of the employment issues listed below, for anyone you are related to, or have a close personal relationship with, outside work:
  - recruitment or hiring processes
  - disciplinary processes

- promotions
- managing performance
- job evaluation
- restructuring or organisational change
- pay decisions
- terms and conditions decisions
- approving expenses claims

## Providing references

9.21 All employment references must be provided by HR. If you get a request for a reference, please or get in touch with HR via AskHR (tel. 020 7527 6070).

# Conflict of interest

10.1 Sometimes, your personal interests, including those of a family member or someone else who is significant in your life, may conflict with the council's interests. This is called a conflict of interest.

10.2 You must:

- be aware of and follow the council's Declaration of Interest procedure
- consider how others will perceive your actions and decisions and not put yourself in a position where there could be a conflict of interest or the appearance of a conflict of interest
- not allow your private interests to conflict with your role at the council including using your official position to further your own or others private interests

10.3 If you are a manager, you must also:

- make sure that ethical standards are embedded in the council's relationships with stakeholders, including outside bodies and partners
- regularly review and keep up to date the list of colleagues to be held on the Declaration of Interest register
- assess and take action to mitigate identified conflicts

10.4 People in some roles must complete a Declaration of Interest each year even if they do not think they have any conflicts of interest. You must check the Declaration of Interest procedure to see if you need to complete an annual declaration.

10.5 If you think you may have a conflict of interest you must complete a declaration of interest.

10.6 Interests change over time so potential conflicts of interests can come up at different times while you are working for the council. You must think about whether a new potential conflict of interest might come up when things change, for example:

- You change roles, go on a secondment, take on acting up duties, or move to a new team, service or directorate
- You, a family member or someone significant in your life becomes involved in something new
- A member of your family or someone significant in your life starts working for the council

## Commissioning, procuring or managing council contracts or partnerships

11.1 Contracts should be given to the best supplier through open and fair competition, following the council's Procurement Rules. No supplier should be put at an unfair advantage or disadvantage. To avoid any perception of unfairness or lack of transparency you must not give special treatment to suppliers linked to colleagues, friends, partners, or relatives.

11.2 If you are involved in any commercial matters including commissioning, outsourcing, procuring or managing council contracts or partnerships you must:

- be aware of and follow the law, the constitution and the Procurement Rules
- take all reasonable steps to support the council in its duty to identify, keep under review and manage any actual, potential or perceived conflicts of interest
- complete documentation required by the Progressive Procurement service, including a conflicts assessment where required which must be maintained during the lifetime of the contract
- not accept any gift or reward (either personally or on behalf of the council) before, during or after a commissioning, procurement, contract management and/or payment activity process beyond the nominal value
- declare any personal interests in a procurement/contract prior to any involvement in a contract the council is considering or a contract that has already commenced in any manner prescribed by the council in addition to the relevant conflicts assessment
- report any conflict of interest on the conflicts assessment to Assistant Director of Progressive Procurement, whether the conflict relates to you or someone else
- be clear on the separation of client and service provider roles
- not disclose confidential information to any unauthorised party or organisation
- exercise fairness and impartiality when dealing with potential service providers or suppliers

- not participate in any employee/management buy-out of council services without the written approval of the council or within two years of leaving employment of the council
- not show special favour to current or former colleagues or their partners, friends, relatives, or associates in outsourcing to businesses run by them in a senior or relevant managerial capacity
- comply with the confidentiality arrangements of the council's partner organisations
- discuss any problems with your Director or Head of Service if you are unclear whether you may have a conflict of interest or be compromised in relation to the awarding of contracts

### **Expressing an interest or bidding on contracts for services**

11.3 If you are going to express an interest, or bid, on a contract for council services you must:

- tell your manager
- tell your Head of Service or Director
- tell the Assistant Director, Progressive Procurement
- follow the instructions of the Assistant Director, Progressive Procurement to avoid any actual, potential or perceived conflict of interest

11.4 If you are directly employed by the council and you are awarded and accept a council contract for services; you must resign from your council role before the contract for services starts. This applies to new contracts awarded and accepted after 1 April 2026.

11.5 If you are a temporary agency worker on assignment to the council and you are awarded and accept a council contract for services; you must end your assignment to the council before the contract for services starts. This applies to new contracts awarded and accepted after 1 April 2026.

## **Financial procedures and use of financial resources**

12.1 This section applies to anyone who is a manager or a budget holder, anyone who procures contractors or services and anyone involved in commissioning grants or goods.

12.2 You must:

- make sure that you use public funds in a responsible and lawful way
- always try to get value for money and avoid legal challenge to the council

- be aware of, and follow, the council's Financial Regulations and Procurement Rules, set out in the constitution
- be aware of, and follow, the council's Declaration of Interest procedure including completing a declaration of interest form within 28 days of a starting employment; completing a new declaration of interest form annually; and / or when your circumstances change and a potential conflict of interest occurs

12.3 If you are a manager, you must also:

- make sure your team are aware of and follow the council's Financial Regulations and Declaration of Interest procedure

If you manage budgets, buy goods or services, or oversee grants for the council, you must use public money properly, follow all financial rules and procedures, declare any interests, and ensure your team does the same.

## Protecting council property

13.1 The council's property and facilities are provided for official council business. The council's property includes its intellectual property which includes inventions, creative writings and drawings, including those created by colleagues in the course of their duties.

13.2 You must:

- only use council property, vehicles or other facilities appropriately, for work purposes, and according to instructions
- not remove council property, including laptops, phones and other portable devices from council premises unless authorised to do so, for example as part of working remotely
- take reasonable steps to make sure that council property isn't stolen, lost or damaged
- report any theft, loss or damage of council property
- return all council property to the council when you leave your job with us

## Gifts, hospitality, sponsorship and corruption

14.1 It is important that the public trusts that council decisions are made for the right reasons and are not improperly influenced. During your work you may be offered gifts, hospitality or sponsorship by suppliers, contractors, consultants, residents or other members of the public. In some circumstances accepting such gifts could leave you open to allegations of bribery or corruption.

14.2 You must follow the council's Anti-Fraud and Corruption policy, Bribery Act Policy and Gifts and Hospitality policy.

## Corruption

14.3 It is a serious crime to corruptly receive or give any gift, loan, fee, reward or advantage in connection with your work duties. This includes doing something or not doing something and showing favour or disfavour.

## Gifts and hospitality

14.4 You must not ask for or accept gifts, rewards, favours or hospitality from anyone connected with the council without written permission from your Director or Head of Service, except for low-value items such as those listed in section 14.7, which may be accepted without permission.

14.5 This applies to:

- gifts, rewards, hospitality or favours from any member of the public, a supplier, a company or an organisation
- anyone who has had, is having or may in the future have dealings with the council
- taking part in activities or accepting hospitality which take place outside of working hours or while on leave
- gifts or hospitality where colleagues repay some or all of the cost

14.6 Hospitality includes drinks, meals, entertainment, overnight accommodation, travel and holidays.

14.7 There are some low-value things that you are allowed to accept:

- a lift in a private or company car or in a taxi
- light refreshments
- inexpensive promotional gifts distributed to a wide range of people (e.g. pens, calendars, diaries)

14.8 If you receive or are offered a gift, reward or hospitality worth £25 or more you must record it on the Gifts and Hospitality form on MyHR. This includes gifts or hospitality that are declined, returned or donated, for example, to the Mayor's charity. The £25 threshold may change, please check the Gifts and Hospitality policy for updates.

14.9 Directors and Heads of Service must not authorise any gifts or hospitality unless they are satisfied that:

- they are not offered with any intention to corrupt
- they could not be seen to be intended to corrupt
- acceptance is in the best interests of the council

14.10 See the Gifts and Hospitality policy on Islington Connect, or ask your manager for a copy, for more information.

### **Sponsorship - giving and receiving**

14.11 You, your partner, spouse or relative must not benefit directly, or indirectly from council sponsorship of an event or service. If you are involved with an event or service which the council proposes to sponsor, you must tell your manager and follow the Declaration of Interest procedure.

14.12 You must give impartial advice and make sure there is no conflict of interest when the council gives support in the community, through sponsorship, grant aid, financial or other means. If there is a conflict of interest, you must tell your manager and follow the Declaration of Interest procedure.

14.13 The rules on gifts and hospitality apply when an outside organisation wishes to sponsor a council activity, whether by invitation, tender, negotiation or voluntarily. Particular care must be taken when dealing with contractors or potential contractors.

## **Confidentiality and disclosure of information**

15.1 You must:

- follow the IT Acceptable Use Policy
- follow the council's policies and practices for handling information under the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025 and the Freedom of Information Act 2000
- complete your mandatory information governance and cyber security training
- not share any confidential information (including intellectual property) with anyone outside the council (unless authorised). This applies both while you work for the council and after you leave
- not share confidential information with colleagues (or about colleagues or councillors) unless you are authorised to do so
- avoid discussing sensitive information in public places and never gossip about or misuse sensitive information about the council, colleagues or service users

### **Commercial matters; competitive tendering, procurement and best value**

15.2 Suppliers, including the council, should not let their competitors know how their business is run, how they work out their prices and costs, or what they plan to charge for a tender. Sharing this kind of information could lead to misrepresentation, fraud or collusion.

15.3 The council must follow the Freedom of Information Act, so suppliers must clearly identify which elements of their tender are commercially sensitive or confidential and colleagues must:

- remember that a crucial part of preparing for competitive tendering or best value activities is keeping commercial information confidential, as each affected workforce may be in competition with suppliers outside the council
- seek the agreement of the appropriate Director or Head of Service before any information about competitive tendering or best value exercises are released
- not use any information obtained in the course of their work for personal gain or benefit, or pass information on to anyone else who may use it in this way

You must follow data protection and IT policies, keep confidential information secure, and ensure commercial and tendering details are not shared or misused for personal gain. Only authorised people should access or disclose sensitive information, and suppliers must clearly mark any confidential parts of their tenders.

## Whistleblowing

16.1 The council is committed to the highest possible standards of integrity. You should use the council's whistleblowing procedure to report serious wrongdoing or malpractice with a public interest factor. For example:

- a criminal offence, including bribery, fraud or corruption
- a failure to follow a legal obligation
- a miscarriage of justice
- dangers to health and safety
- damage to the environment
- a deliberate attempt to conceal any of the above

16.2 The whistleblowing procedure sets out the protections available to colleagues who make disclosures and the protection available under the Public Interest Disclosure Act.

16.3 If you are involved in a whistleblowing investigation you might be asked to take part in an interview about what happened. Before this happens, your manager and HR will be told so they can tell you what support is available.

16.4 You must not use the whistleblowing procedure for day-to-day employment issues, complaints about or disagreements between colleagues which should instead be reported to management or considered under the grievance procedure.

## Reporting suspected fraud and corruption

17.1 We all have an important part to play in combatting fraud and you have a duty to report suspected fraud, irregularities, bribery or corruption to [internal.audit@islington.gov.uk](mailto:internal.audit@islington.gov.uk).

17.2 More information can be found in the Anti-Fraud and Corruption Policy (AFCP) on Islington Connect.