

## Code of Conduct

### Purpose

The Code of Conduct explains how we work in Westminster. It provides a framework in which honesty, integrity and respect are the foundation of how we deliver services to our residents.

Following the guidance set out in this Code of Conduct will give you the reassurance that you are providing a high standard of service, and the confidence to challenge others who are not. This Code will also tell the public and people who use Council services what they should expect from Council employees.

This Code will help guide you in the normal course of your work but it cannot address every possible situation and is no substitute for common sense.

If you find yourself in a situation where you are unsure of the right course of action to take, you may find it helpful to ask yourself the following questions:

- Is it legal?
- Is it ethical?
- Is it consistent with our policies and this Code of Conduct?
- Can I explain it to my family and friends?
- Would I feel comfortable if it appeared in a newspaper?

Alternatively ask for help from your line manager, or see the full policy [here](#).

### Scope

The Code of Conduct applies to all employees but the principles also apply to all agency workers, consultants, contractors and anyone providing services on behalf of Westminster City Council.

### Our Values

Our values and behaviours underpin how we deliver services to our communities, how we operate as an organisation and how we work together.

[Productive, Ambitious, Collaborative and Enterprising \(PACE\)](#) demonstrate how we do this. It is important that you get to know the values and behaviours well, and discuss within your team what they mean for you, and how you can demonstrate them effectively.


## Professionalism

- All our interactions and work with the public and colleagues will be done in an appropriate, courteous and professional way.
- We act in a way that promotes trust and confidence in the Council and will not do anything that could affect its reputation. This includes action outside of work that could undermine the confidence the public has in us.
- We will not act or take decisions to gain financial or other material benefits for our family, our friends, or ourselves.
- We communicate honestly and openly with our managers and others in leadership positions and will raise concerns, including those about safety, possible misconduct, and violations of laws or regulations.
- We work in a professional manner with all Councillors regardless of their political affiliation and we do not allow our own personal or political opinions to interfere with our work.


## Trust

- We all perform to the best of our ability and for the benefit of the Council and our residents with honesty, integrity, impartiality and objectivity.
- We are accountable to the public for our decisions and actions. We will make decisions in an open and transparent manner and will not withhold information from the public unless there are clear and lawful reasons for doing so.
- We spend the Council's money wisely.
- We only submit appropriate claims for expenses and allowances – claiming only for payments that we are entitled to receive and keeping accurate records to demonstrate this. If we receive any payment in error, for example an overpayment of salary or expenses, we will notify our manager as soon as possible.
- We take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- We will not order goods for our personal use through a Council account.
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## Compliance

- We comply with legal requirements at all times. We familiarise ourselves with the applicable laws, policies, guidance and best practise in our areas of work.
- We are responsible for keeping up to date and following Council Policies, Procedures and Regulations when carrying out our work. See Financial Regulations ( [Financial Regulations.pdf](#)), [Procurement Regulations](#)

## Safeguarding

- We are committed to safeguarding children and vulnerable adults and fully comply with safeguarding policies and procedures (  [SA.pptx](#) )
- If we have any concerns about any aspects of safeguarding we will raise these with our line manager in the first instance. Alternatively, we can raise any safeguarding concerns using the Whistleblowing Procedure ([Whistleblowing Policy Oct 2018.docx](#))

## Political Neutrality

We are here to provide outstanding services to the residents of Westminster and understand the vision or priorities for doing this will be set out by our elected Members. There may be times where our personal opinion or politics differ from Members; however, we will remain politically neutral and will not allow our personal opinions to interfere with work. In addition, some posts are politically restricted either by law or because they are politically sensitive, where this is the case we comply with any legal restrictions on political activities.

## Equality and Diversity

We treat others with respect, fairness, and dignity. We will not allow any kind of discriminatory behaviour, harassment or victimization. If we see anyone behaving in this way, we will challenge in a professional manner.


## Conflict of interests

- We consider how others will perceive our actions and decisions and we do not put ourselves into a position where there could be a conflict of interest or the appearance of a conflict of interest.
- We use public money/property in a responsible way. We will not use money, property (including vehicles), or any other facilities provided by Westminster for personal use unless we are authorised to do so.
- We will not allow our private interests to conflict with our job at Westminster. This includes using our official position to further our own or others private interests.
- We will declare all potential financial or non-financial interests in line with our guidance. ([Declarations of Interests and Out of Work Activities Form](#))
- We will not be involved in decisions on recruitment, discipline, promotion or pay and conditions for any worker or prospective worker if we are related or where there is a close personal relationship outside of work. It is important to avoid any possible perception of bias.
- We will not provide a reference on behalf of Westminster City Council or provide references to Westminster City Council, in the case of prospective workers, for relatives or friends.

## Personal Financial Affairs

We will all conduct our personal financial affairs so that Westminster and all other public bodies are not defrauded or otherwise denied the income and /or other resources it is legally entitled to.

## Whistleblowing

If we become aware of activities that we believe to be illegal, improper, unethical or otherwise inconsistent with this Code of Conduct we will report the matter to our line manager or through the whistleblowing procedure. ( [WCC RBKC Whistleblowing Policy.docx](#))

## Confidentiality

We are an open organisation. However, some information may be confidential or sensitive and not meant for a wider audience. We will therefore ensure that we do not release confidential information to anyone who is not entitled to it. We will comply with all aspects of the General Data Protection Regulations (GDPR).

## Health and Safety

We all have an obligation to work in a way that keeps colleagues, ourselves and the public safe. We will ensure we are familiar with and comply with Westminster's health and safety requirements, which can be found on under 'Health and Safety in the workplace' under the 'How do I?' section.

## Additional Employment

We will declare any additional employment outside of Westminster (either paid or unpaid).


We understand that any additional employment must not be in conflict (or there should not be a perceived conflict of interest) with our role in Westminster or the interests of Westminster City Council. This includes ensuring working hours allow for enough rest so that we are able to give 100% to our work for Westminster City Council.

## Guidance on Dress

We will represent Westminster in the most positive way and present a smart, clean and professional image, particularly when meeting with customers.

We will dress appropriately, wear our ID badge when at work, wear a uniform where one is provided and will be aware of health and safety precautions e.g. wearing protective clothing as appropriate.

## Gifts and hospitality

- We fully comply with the Bribery act 2014 and act within the Council's Anti-Bribery and Corruption Policy ( [ABP.pdf](#))
- We exercise discretion in offering and accepting gifts and hospitality. We consider how it might affect our relations with the party offering it and how elected Members, the public and other staff, might perceive it. If in any doubt we will discuss with our line manager.
- We record all gifts or hospitality valued at £25 or more (whether accepted or not) in a timely manner and these are published on the Council's web site for public scrutiny. Our guidance on this can be found [here](#).

## Social media

We will not publish or post anything on social media that could damage the reputation of the Council. This includes on our personal accounts.

## Contact with the media

We will not make any comments to the media or represent ourselves as expressing the views of Westminster City Council unless authorised to do so.

## Managerial Responsibility

- If we are line managers, we will make sure our employees are aware of the Code of Conduct and we will address any breaches as soon as they occur.
- We will proactively manage any employment issues that arise in our teams, in line with our policies. This includes promptly addressing any performance issues.
- We will not be involved in making significant decisions that involve a relative, partner or friend. We are not permitted to line manage a partner or family member.
- If anyone raises concerns, including those about safety, possible misconduct, and violations of laws or regulations we will take them seriously, investigate as appropriate and take any action necessary, in a timely manner.