



Office of the
Police and Crime
Commissioner
for Warwickshire

Code of Conduct for Staff and Representatives

Policy Owner	Chief Executive and Monitoring Officer
Version number	1.0
Policy Implementation Date	September 2021
Next Review Date Prior To	2 years after date of publication

Security Classification	OFFICIAL
Disclosable under Freedom of Information Act?	Yes
Risk Rating	Low
Equality Analysis	Low

The Office of the Police and Crime Commissioner welcomes comments and suggestions from the public and staff about the contents and implementation of this policy. Please e-mail opcc@warwickshire.pnn.police.uk

1. Aim of policy

The Office of the Police and Crime Commissioner (OPCC) is publicly accountable and frequently works in partnership with other organisations, both in the public and private sector. It is therefore vital that all staff and representatives of the Police and Crime Commissioner (PCC) conduct themselves in an exemplary manner in all aspects of their work and show no bias whatever their personal or political views might be.

This code sets out some of the areas where issues can arise. The code is designed to protect staff, volunteers and contractors, but where it is breached, further disciplinary action may be taken, as outlined in internal procedures.

2. What the policy covers

The policy covers the obligations of those who work in the Office of the Police and Crime Commissioner for Warwickshire and who are contracted to or represent the Commissioner, including:

- Deputy and/or Assistant Police and Crime Commissioner(s) if in post.
- Staff of the Commissioner.
- Independent Committee Members.
- Independent Custody Visitors.

Those listed above shall be referred to as 'staff and representatives' from this point forward.

A separate Code of Conduct is in place for the Police and Crime Commissioner.

This code does not apply when staff are acting in a purely private capacity, although good standards of behaviour are expected from all in their private affairs.

3. General obligations

The Policing Protocol Order 2011 (issued under the Police Reform and Social Responsibility Act 2011) requires that all parties to whom the Protocol applies will abide by the seven principles set out in Standards in Public Life: First Report of the Committee on Standards in Public Life, known as the Nolan Principles. The Commissioner is expected to abide by these principles as follows:

- **SELFLESSNESS** - Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.
- **INTEGRITY** - Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

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- **OBJECTIVITY** - In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
- **ACCOUNTABILITY** - Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
- **OPENNESS** - Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
- **HONESTY** - Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- **LEADERSHIP** - Holders of public office should promote and support these principles by leadership and example.

In addition, all colleagues, partners and members of the public have the right to be treated equally and should not be discriminated against on the grounds of age, disability, gender reassignment, pregnancy, maternity, race, religion or belief, sex, sexual orientation or marital/civil partnership status. The Commissioner has a responsibility to ensure that the office's Equality Policy is adhered to in all work activities.

Staff and representatives must treat the public, partners and colleagues fairly, efficiently, politely and in line with the office's policies.

4. College of Policing Code of Ethics

The College of Policing [Code of Ethics](#) sets out policing principles and the standards of behaviour expected of police forces in England and Wales. The OPCC will abide by the Code of Ethics, promote the Code amongst staff and representatives and ensure that it is embedded in both the OPCC and the wider Force.

5. Use of resources

The Commissioner is responsible for the efficient use of the public resources held. That includes financial resources, equipment and the staff who work for the Commissioner. There are legal requirements in place concerning the use of resources. Staff and representatives must use OPCC resources responsibly and always give value for money. If staff or representatives know of someone who is not maintaining these standards or has not followed the code, this must be reported to the Chief Executive and Monitoring Officer or the Commissioner directly. The OPCC Whistleblowing Policy will apply where appropriate.

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Telephone, computer, e-mail and internet facilities are provided for business use. Further details can be found in the Warwickshire Police Internet and E-mail Terms of Use. Private work of any sort must not be undertaken in OPCC premises or by using OPCC equipment or materials.

Staff and representatives should not have personal items delivered to the OPCC or other offices associated with the OPCC.

6. Social media

Postings on social media sites can be accessible to a very wide audience and can remain available for a long period of time.

Staff and representatives should therefore take great care not to post anything that may be considered offensive, disrespectful or discriminatory towards the Police and Crime Commissioner, OPCC, staff, contractors or associated people such as partner organisations.

It must be borne in mind that it will not be an acceptable excuse to claim that such postings are private i.e. even if it can be shown that they have been made from a personal device and in your own time.

7. General Data Protection Regulation

Staff and representatives must respect the confidentiality of the information to which they have access at work. This includes respecting the interests of colleagues and of the general public. Infringement of this could lead to disciplinary proceedings.

Any information to which there is access at work must not be used for personal gain or passed on to others who might use it in this way.

Staff and representatives should not tell anyone outside the OPCC what takes place at meetings held in private attended as part of their job role or the contents of any confidential document that they have access to as part of their work for the OPCC.

Confidential information about other people or members of the public must not be given to anyone who does not need to know it, unless it is required under safeguarding requirements to help the individual or prevent serious harm to them or others. Where there is no safeguarding concern, an individual's permission must be sought before giving information about them to others outside of the organisation. The OPCC GDPR policies must be adhered to.

Data Protection Act 2018 laws are to be followed at all times.

8. Conflicts of interest

Personal relationships with colleagues, members of the public and other organisations must not lead to any suspicion that it could affect staff and representatives' work.

Staff and representatives should not be involved in the recruitment, promotion, pay, benefits, training or discipline of anyone who is a relation, partner or with whom they otherwise have a close personal relationship outside of work. If the situation is unavoidable, such an interest should be declared to the Chief Executive and Monitoring Officer, to ensure they are seen to be fair.

All staff employed by the OPCC are politically restricted in that they may not participate in any formal political activity. This restriction does not apply to the Deputy Police and Crime Commissioner (DPCC) or those staff members appointed by the Police Authority who have not received a new contract since this time.

9. Commitments outside of work

For all staff employed by the OPCC, in accordance with the terms of employment, permission must be sought from the Chief Executive and Monitoring Officer to engage in any other business or take up any additional appointment. Such permission will not be unreasonably withheld.

In any case, staff must not be involved in any outside activity or work that could cause a conflict of interest with his/her responsibilities to the OPCC, or which makes use of knowledge or information which the staff member has access to because of their position.

Similarly, where a member of staff wishes to partake in any voluntary activity or role in a voluntary organisation, care should be taken to clarify the expectations of the role and whether there is any conflict of interest.

If there is any uncertainty, any such activity should not be engaged in before first seeking the express permission of the Chief Executive and Monitoring Officer.

Liability can arise from formal membership of external organisations and permission should be sought if there is reason to believe that any liability may arise.

Other than those areas outlined above, staff members and representatives' off-duty hours are not the OPCC's concern unless a person's activities bring the reputation of the office into disrepute. Staff and representatives must never put themselves in a position where duty and private interests conflict, or where public confidence would be weakened.

Staff and representatives are required to register any interests. A register is held in the OPCC.

10. Contractors and suppliers

Contracts and orders must be awarded on merit and in line with OPCC procedures. Any relationship with a contractor or supplier, with whom the person is also involved at work, must be declared to the Chief Executive and Monitoring Officer.

Staff and representatives must not try to influence the awarding of contracts or orders to any contractor or supplier. Equally, current or past employees or their partners, close relatives or associates must not be favoured when undertaking business with the companies for which they work. Staff and representatives must be fair when dealing with all customers, suppliers, other contractors and sub-contractors.

If staff and representatives are considering any alternative form of service delivery, a management buy-out, staff mutual, social enterprise activity, etc, the Chief Executive and Monitoring Officer must be told immediately. Staff and representatives must not then take part in any relevant contract awarding process.

11. Sponsorship / grants / procurement and partnership arrangements

All staff and representatives have a responsibility to disclose any gifts or hospitality offered in the course of their work for the OPCC in line with the Gifts and Hospitality Policy, which is available by contacting the office. If an outside organisation wants to sponsor one of the OPCC's activities, the rules about accepting gifts and hospitality must be followed. Particular care should be taken when dealing with existing or potential contractors.

If the PCC provides support to the community or an organisation there should be no conflict of interest involved. For instance, staff and representatives must never try to influence a sponsorship decision in favour of a specific venture that they, their partner or any other relative or close friend are involved in, no matter how worthy the cause.

Many of the Commissioner's objectives are delivered by developing partnership arrangements with one or more organisations. These organisations may be other public sector organisations, private sector companies, voluntary organisations or community groups. It is important that if staff or representatives participate in such a group, they are clear as to the authority invested in them by the Commissioner and the other partner organisations.

Staff and representatives should always check with their line manager as to the extent of their participation and as usual show no bias and ensure that all decisions are based on achieving best value for the Commissioner.

12. Vetting

All staff and representatives, except the Commissioner and DPCC, will be vetted by Warwickshire Police. The level of vetting required will be decided when a position is advertised. Re-vetting will ordinarily take place every three years.

If a circumstance arises which could impact upon the current vetting confirmation, this must be notified to the Chief Executive and Monitoring Officer immediately or in the case of the postholder, must be reported to the PCC. Further vetting may be required.

If staff or representatives are involved in any civil or legal proceedings these should be reported to the Chief Executive and Monitoring Officer or in the case of the postholder, the PCC as soon as the situation occurs.

13. Complaints about Members of Staff and Representatives

Staff of the OPCC are subject to their terms and conditions of employment which details conduct and disciplinary procedures. Representatives and contractors employed by the OPCC will be subject to such conditions as are set out in individual contracts. Those terms and conditions shall determine the process that will be followed in the event that allegations of misconduct arise.

The OPCC has a Complaints Policy which is available by contacting the office.

14. Reporting Issues of Concern for Conduct

If a member of the public, employee or partner organisation wishes to raise a concern about the conduct of a member of the OPCC's staff or representatives, this should be reported to the Chief Executive and Monitoring Officer marked as private and confidential using the contact details on our website.

Should the concern involve the Chief Executive and Monitoring Officer, the matter should be reported to the PCC marked as private and confidential using the same contact details.

6. Revision Record

Date of change	Nature of revision
September 2021	General review