

CODE OF CONDUCT FOR IPCC EMPLOYEES

1 Foreword from the CEO

The IPCC's statutory purpose is to secure and maintain public confidence in the police complaints system in England and Wales. As we are the independent guardians of the system, the public's perception of and trust in how we conduct ourselves as public servants is essential.

This document is the IPCC's approved Code of Conduct for all staff. It sets out the standards of behaviour and practices that you, as a member of our staff, are expected to follow in discharging your responsibilities. The Code has been developed in consultation with staff and in the light of our experiences during the life of the IPCC.

It is a requirement of your role that you familiarise yourself with the Code and what it means for you personally in your role. You need to ensure you understand the organisation's expectations of you, so please discuss with your line manager if you need any further guidance or have concerns as to how any aspect might apply to you. Acting in accordance with the values of the organisation and this Code matters for each and every one of us.

This code is based on Cabinet Office guidance but importantly, it has been developed to reflect the IPCC's unique role and our organisational values. It is also consistent with the principles of the IPCC [Commissioner's Code of Conduct](#) .

If you have any queries on how the Code applies to you or colleagues, then please raise them initially with your line manager. The Commission Secretary and her team or my Private Secretary can also offer further help or advice on the interpretation of the Code.



Lesley Longstone

Chief Executive

Table of Contents

1	Foreword from the CEO	1
2	IPCC VALUES	4
3	STANDARDS OF BEHAVIOUR	4
4	ACCOUNTABILITY	6
	4.1 IPCC Policy and procedures.....	6
5	VALUING DIVERSITY	6
6	CONFLICTS OF INTEREST	7
	6.1 Registering Interests.....	7
	6.1.1 Staff	8
	6.1.2 Chief Executive and Directors.....	8
	6.2 Identifying a Conflict of Interest.....	8
	6.3 Gifts and Hospitality	9
	6.3.1 Gifts	10
	6.3.2 Hospitality	10
	6.3.3 Bribery Act	11
7	REPRESENTING THE IPCC EXTERNALLY	11
	7.1 Contact with the Media	12
	7.2 Contact with Parliamentarians	12
8	OUTSIDE OF WORK	12
	8.1 Social Media	13
	8.2 Other Employment.....	13
	8.3 Political Activities	13
	8.3.1 Politically Restricted Posts.....	14
9	BREACHES OF THE CODE OF CONDUCT	15
	9.1 Conflict at Work	15
	9.2 Employee Involvement and Management Direction	15
	9.3 Use of Alcohol or illegal drugs.....	15

9.4 Whistle blowing..... 16

2 IPCC VALUES

The IPCC is a values-based organisation. People will work for it because they believe in what it is trying to do. The IPCC's 5 organisational values are:

- To act justly and show respect for human rights
- To demonstrate independence
- To value diversity
- To act with integrity
- To operate with openness

These values underpin all of our work and Commissioners and staff are encouraged to proactively consider them in all aspects of their roles. They are part of our recruitment criteria and are reinforced through induction and training and articulated in actions and words by those who lead the organisation. At times living these values while delivering our statutory duties will be challenging, but we recognise they are aspirational and help to inspire us in delivering our roles.

3 STANDARDS OF BEHAVIOUR

The nature of the IPCC's business means that the way in which we conduct ourselves and go about our business is as important as the results we deliver. We are expected to carry out our roles with dedication and commitment to the IPCC, its values and code of conduct. Outlined below are the standards of behaviour by which all IPCC employees should conduct themselves and should expect to be treated.

As an IPCC employee you are expected to:

- Always act in a way that is professional and that deserves and maintains the confidence of all those with whom you have dealings.
- Treat colleagues, Commissioners, members of the public, stakeholders and any other individuals you come into contact with through your role with courtesy, consideration and fairness. Aggressive or bullying behaviour will not be tolerated in any form.
- Demonstrate respect for others' background, experience and the different perspective this may bring to a situation.
- Respond constructively to others' ideas, points of view and input, whether or not they reflect your own position. Where appropriate opportunities should be taken to consult on matters that affect others.
- Maintain the IPCC's independence in all your dealings and where necessary identify any issues that may have an actual or perceived impact on your or the IPCC's independence. (See section 6- Conflicts of Interest).
- Learn from mistakes when they happen, work positively to resolve them and where appropriate share learning within the organisation.

NOT PROTECTIVELY MARKED

- Challenge or report inappropriate behaviour directed at yourself or others that you may encounter in delivering your duties. (see section 9- Breaches of the Code of Conduct)
- Deliver your duties in line with the code of conduct and supporting policy. Should you become aware of a matter that contradicts any one of these you should alert your line manager or other appropriate manager.

As an IPCC employee you should not:

- Misuse your official position, for example by using information acquired in the course of your official duties to further your private interests or those of others.
- Accept gifts and hospitality or receive other benefits from anyone which might be perceived by others to compromise personal judgement or integrity (see section 6.3- Gifts and Hospitality)
- Use your position to discriminate unlawfully or pressure others to discriminate unlawfully (see section 5- Valuing Diversity).

As an employee of the IPCC you can expect:

- To be treated with courtesy, consideration, fairness and respect by colleagues at all grades within the organisation
- To receive appropriate support from your manager including regular 1-2-1s, mid-year and annual reviews and annual Performance Development Plans (PDRs).
- To be treated fairly in recruitment, training, promotion and the allocation of work.
- Not to be harassed or intimidated at work and in particular not to be harassed or intimidated because of your race, gender, colour, ethnic or national origin, religion, disability or marital status, age or sexuality. (See section 5- Valuing Diversity).

All IPCC employees are expected to make all reasonable efforts to deliver their role in accordance with the above. If you identify an issue in doing so then you should consult your line manager in the first instance and support can be provided. However a persistent or significant failure to meet any aspect(s) of the code will be taken seriously and may lead to capability or disciplinary sanctions

4 ACCOUNTABILITY

All staff are accountable to the IPCC which in turn is accountable to the Home Office, as the IPCC's sponsor department. This relationship is set out in the Management Statement and Financial Memorandum ([viewable here](#)).

The Home Secretary is the Minister responsible for the IPCC and is ultimately accountable to Parliament for the IPCC's effectiveness and efficiency.

As a member of IPCC staff you are expected to:

- Conduct yourself without bias and with integrity, objectivity and honesty. You should not deceive or knowingly mislead others, including other staff, the Commission, the sponsor department, Ministers, Parliament or the public.
- Deal with the affairs of the public sympathetically, efficiently, promptly and without bias or maladministration. You should always aim to offer the public the highest standards of conduct and service.
- Ensure that the IPCC's resources are used in the most economical, efficient and effective manner as befits public money.

4.1 IPCC Policy and procedures

The Code of Conduct is complemented by a suite of IPCC policies and procedures that provide more detailed guidance and direction regarding specific aspects of your role and how you are expected to deliver your duties.

Where appropriate you will find references within the Code to relevant policy and the full library of IPCC policies is available via iHome.

5 VALUING DIVERSITY

The IPCC has an established Single Equality Scheme that covers its commitment to equality both as a service provider and employer. In line with the Equality Act 2010, in considering diversity and equality issues in our work, the IPCC has identified the following 'protected characteristics':

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race (including ethnic or national origins, colour and nationality)

- religion or belief (including lack of belief)
- sex
- sexual orientation

Socio-economic disadvantage and Welsh Language are also considered as part of the IPCC's Equality Impact Assessment (EIA) framework.

The IPCC is a learning organisation in which knowledge and learning are shared amongst colleagues and improvement becomes endemic. With this in mind it is clearly important that colleagues are free to explore and discuss issues around diversity and difference. Nothing in this Code of Conduct should be interpreted as seeking to prevent or constrain such discussion.

It is unacceptable however for employees to discriminate unlawfully – either in the decisions they make, or in putting pressure on another person to discriminate or in victimising someone who has raised an issue of potential discrimination in good faith and if you do so, you will face disciplinary action.

6 CONFLICTS OF INTEREST

It is fundamental to the IPCC's credibility as guardian of the police complaints system that it is seen as an independent body. Given our responsibility as public servants and the nature of the IPCC's remit we must be prepared to face scrutiny and demonstrate that our decision making is free from any bias.

A real or perceived conflict of interest occurs when a reasonable member of the public could perceive that your behaviour or decision making might be subject to influence.

6.1 Registering Interests

To manage the risk of a conflict of interest arising, Commissioners and IPCC staff are expected to identify and register specific personal interests. This minimises the likelihood that you would be asked to become involved in a matter where your judgement could be perceived as conflicted. This provides a protection to both yourself and the organisation.

All staff are required to consider and complete a register of interest on joining the IPCC and to subsequently review and update this on an annual basis. The types of interest you are required to register are determined by the nature of your role and your degree of influence over IPCC decision making.

NB: the register of interest is distinct from any information provided as part of your application for security clearance and should be treated as separate submissions.

6.1.1 Staff

All staff are required to declare:

- Any other employment or remunerated activities outside of your IPCC post.
- If any close family member or close personal friend is:
 - A police officer, member of police staff, or anyone otherwise employed under the direction of a Chief Constable.
 - An individual or member of any body affiliated to or associated with overseeing the management of police forces in England and Wales or seeking to influence the provision of police services in England and Wales.
 - An employee of the Serious Organised Crime Agency (SOCA)¹; the UK Borders Agency (UKBA); or HMRC.

Close family members include personal partners, parents, children (adult and minor), brothers, sisters and the personal partners of any of these.

If you require further advice please contact the Commissions Secretariat.

6.1.2 Chief Executive and Directors

The Chief Executive and Directors must declare their interests to the Commission Secretary (with the exception of trade union membership and membership of a political party) in the same way as Commissioners do². The information is updated on a 6 monthly basis, is published on the IPCC website and is available for public inspection.

6.2 Identifying a Conflict of Interest

While the above controls will minimise the likelihood, it is possible that in the course of normal day-to-day business an actual or potential conflict of interest may occur. It is therefore your responsibility as a member of IPCC staff to be vigilant to this and if, in the course of your duties a matter arises that you have a personal interest in, you must declare it to your responsible manager immediately. Although not an exhaustive list, the below list matters that should be raised:

- You become aware of a complaint or referral received by the IPCC that either yourself, a close family member or close personal friend has a significant connection to.

NB: At the outset of either a managed or independent investigation, all members of the investigation team are required to identify any actual or perceived conflicts of interest relating to the investigation. Please consult the operations manual for further detail.

¹ In 2013 the Serious and Organised Crime Agency will be replaced by the National Crime Agency.

² As set out in the 'Commissioner's Code of Conduct'

- Any close personal relationship with another employee of the IPCC, a Commissioner or anyone seeking work with the IPCC where you might have influence over decision making that may affect the other person– (e.g. recruitment, appraisal, discipline) or where you might be jointly involved in influencing decision making- (e.g. Mode of Investigations decision, procurement, authorising expenses).
- You become aware of any other aspects of IPCC business in which you have a personal outside interest (e.g. procurement of goods or services).
- You or a close family member living at the same address is:
 - Arrested or charged with a criminal act, including any driving offences where you receive endorsements to your licence. Any driving offences incurred while driving an IPCC vehicle (including traffic offences) should be reported to your line manager and the procurement team.
 - Receives a summons.
- Off-duty you have needed to identify yourself as an employee of the IPCC to a police officer, member of police staff or an employee of the SOCA³; or the UKBA; or HMRC.

NB: Staff are advised not to disclose they are a member of IPCC staff unless asked to do so, to avoid the perception of exerting any influence. Staff are not expected to raise incidental contact with members of the police service i.e. asking for directions.
- Any other significant change in personal circumstance that could have a perceived influence on your decision making or impartiality or affect your security clearance i.e. serious financial difficulties or criminal conviction. Refer to [‘Reporting change of circumstances policy’](#) or consult the Security Team for advice.

Your manager will need to consider whether your interest is significant enough for any further action to be necessary and/ or separate you from the matter.

A conflict of interest arising is not in itself a negative reflection on the individuals concerned, but failure to raise as and when it is identified may exacerbate the situation and could be dealt with as a misconduct matter. If you are uncertain as to whether a matter should be declared you should consult either the Commission Secretariat or the Director of Business Services.

6.3 Gifts and Hospitality

As an IPCC employee you should not use your official position to receive benefits of any kind from a third party, which might reasonably be seen to compromise your personal judgement and integrity.

³ In 2013 the Serious and Organised Crime Agency will be replaced by the National Crime Agency

6.3.1 Gifts

You must not accept or give any gifts in connection with your official duties. The only permissible exception is where the refusal to accept a gift is judged to cause unnecessary offence.

Any gift that is accepted must be declared, irrespective of perceived value. Both the gift and a completed declaration form should be passed to the Commission Secretariat. The gift will then be passed to one of the IPCC's designated charities. Alternatively, as the gift recipient, you may retain the gift and make a donation to one of the IPCC's charities, equivalent to the approximate value of the gift as determined by the Commission Secretariat.

Where the gift is not appropriate to give to charity, the Commission Secretary will advise on what should be done with it.

In the event that you suspect a gift has been offered with the expectation of influencing you, this must be immediately reported to your line manager (see section 6.3.3- "Bribery Act" below).

6.3.2 Hospitality

You may accept conventional hospitality provided it is normal and reasonable in the circumstances, for example:

- Tea, coffee, biscuits and sandwiches at meetings.
- A working lunch in the course of normal business provided this is not frequent, regular or lavish. NB: please see section 9.3 on consumption of alcohol during working hours

Apart from the conventional hospitality outlined above, all other invitations or hospitality should be declared to the Commission Secretary prior to responding. All hospitality received must be in relation to delivering your duties as an employee of the IPCC and you should apply the test as to whether a reasonable member of the public would consider it appropriate for you to accept. This may include invitations to an annual dinner or conference of an organisation with which the IPCC has regular contact. Offers made by stakeholders and service providers to attend purely social, artistic or sporting functions must be declined and returned to sender. Advice can be sought from your line manager or Commission Secretary.

In line with the Business Expenditure policy, employees should not expect the IPCC to pay for the meals/drinks of stakeholders and service providers unless they have permission from their line manager to do so. Any hospitality provided should be in line with IPCC's Business Expenditure Policy.

All declarations of hospitality are placed on a register which is reviewed on a 6 monthly basis by the Chair and CEO and made available via the IPCC website.

6.3.3 Bribery Act

On 1 July 2011 the Bribery Act 2010 came in affect. The Act broadly defines bribery as giving a financial or other advantage to encourage a person to perform their functions or activities improperly or to reward a person for already having done so.

While bribery has long been a criminal offence, the Act takes a robust approach, establishing new criminal offences of which two are of specific relevance to you as a member of staff:

- Active bribery- bribing a person to induce or reward them to perform a relevant function or activity improperly
- Passive bribery- requesting, accepting or receiving a bribe as a reward for performing a relevant function or activity improperly

Definitions

A **relevant function** is defined as a function which should be carried out in either good faith, impartially or that the person performing it is in a position of trust.

Improper performance would be a failure to perform a function in line with expectation. The test for whether performance is improper is what a reasonable person in the UK would expect.

Any incident of bribery will be dealt with as a serious disciplinary matter, which, if proven, is likely to result in dismissal as well as being a criminal offence. The maximum penalty for an offence of bribery by an individual is 10 years imprisonment and/ or an unlimited fine. You should familiarise yourself with the IPCC's [counter fraud policy documents](#).

If you are offered a bribe, this must be reported immediately to your line manager. If you have any suspicion that another IPCC employee is involved in bribery you should consult your line manager or the whistle blowing policy (see section 9.4- whistle blowing policy) as appropriate.

7 REPRESENTING THE IPCC EXTERNALLY

As a IPCC employee, when writing or speaking publicly (either in a formal speech or informally at a meeting) on any matter which could be seen as falling within the remit of the IPCC, you are likely to be seen as representing the IPCC or the IPCC's position on an issue. This may well be the case even when you may believe you are writing or speaking as an individual.

Speeches, presentation or articles, which relate to IPCC work, should be cleared in advance with your Director. See also section 8- Outside of Work.

7.1 Contact with the Media

All media enquiries should be directed to the Press Team in the first instance. You should not make direct contact with the media or respond to media enquiries unless it has been agreed in advance that you should do so.

7.2 Contact with Parliamentarians

Any contact through your role from Parliamentarians including members of the House of Commons (MP), members of the House of Lords, Welsh Assembly Members (AM), members of the European Parliament (MEP) and local councillors should be referred to the Parliamentary Officer within the Commission Secretariat.

Parliamentary questions in particular often require a quick turnaround and should be forwarded to the Parliamentary Officer immediately. Further guidance on 'Interacting with Parliamentarians' is provided within the Operations Manual.

8 OUTSIDE OF WORK

As a member of the IPCC you are expected to conduct your professional life in line with the IPCC's values, this code and IPCC policies and the expectation is that this should not encroach on your private life, subject to the following guidance regarding off-duty time:

You must not bring the IPCC into disrepute, by doing or saying things that will reflect badly on the IPCC. Membership of or the active participation in activities organised by groups or organisations whose values are inconsistent with the IPCC's which may create reasonable doubt in your ability to comply with the IPCC's values and this Code. In these circumstances you may be subject to a management investigation in accordance with the IPCC's Disciplinary Procedures. It is important that you seek advice from your line manager or the Head of HR in advance of taking part in any event which may fall into this category.

You must also tell your line manager as soon as practicable if you inadvertently find yourself in a situation outside work which you had not anticipated and which you believe could negatively impact on the public confidence in the IPCC.

You must not knowingly put yourself in a position where your private interests conflict with the IPCC's and any conflict of interest must be resolved in the IPCC's favour. For example you should not knowingly attend a social event, at which an individual currently under IPCC investigation is present, if by doing so you could be perceived by a reasonable member of the public as being open to personal influence in the way in which you do your job. If you do inadvertently attend such an event and find yourself in this situation, you must report it to your line manager.

8.1 Social Media

Expectations in relation to your conduct as a member of IPCC staff apply equally to use of social media and online activity as they would do in any other social context. You must not refer to any IPCC related matters in these forums unless you have been authorised to do so i.e. as a member of the Press Team (in which case personal and professional accounts should be kept strictly separate).

You are advised to exercise due care in sharing any personal details online and identifying yourself as a member of IPCC staff outside of professional or business related forums.

8.2 Other Employment

You are expected to be fully committed to the work of the IPCC and therefore required to seek permission before starting any employment elsewhere. Permission will not be unreasonably withheld but due consideration must be given to whether:

- There is a potential impact on your performance within your IPCC role and/ or implications for the provisions of the Working Time Regulations.
- There is any potential conflict of interest with your job at the IPCC. Conflicts may arise, for example, if the other employer comes under the remit of the IPCC's powers or is seeking a contract for goods or services with the IPCC.

You are advised to consult your line manager at the earliest available opportunity and any additional employment should be reported in your register of interest return.

8.3 Political Activities

This section is concerned with party political activity liable to give public expression to political views rather than with privately held beliefs and opinions. It is not intended that these restrictions affect trade union membership or activities.

The IPCC is independent from Government, the police and pressure groups. Public confidence might be affected if it was believed that an individual member of staff's personal political views were compromising its independence and impartiality or influencing its decision making.

Employees, whether in politically restricted posts or not, may be members of a political party (and need not declare it). If you are not in a politically restricted post you may participate in political activities such as helping with administration at the time of a general election or delivering leaflets provided that you are conscious of the standards of behaviour expected of you as set out in this Code and exercise a proper discretion, particularly in regard to the work of the IPCC. On matters directly affecting the IPCC, you should not make political speeches or engage in other political activities.

If you wish to run for office, you must seek advice at an early stage from your Director/Head of Human Resources and you may be required to take a leave of absence to do so.

8.3.1 Politically Restricted Posts

Posts at or above grade 15 are politically restricted. This covers the posts of Chief Executive, all Directors and Heads of Function. The posts of Senior Lawyer, Commission Secretary and Press Officers are also considered politically restricted.

These posts have been identified as politically restricted because:

- They act as “spokesperson” for the Commission or have a significant degree of face-to-face contact with stakeholders, pressure groups, or other bodies or individuals who are seeking to influence the IPCC
- It would appear to the public that the post holder had some influence over the outcome of the Commission’s decisions.

If a post is Politically Restricted this means that you should discuss with your line manager before taking on any political activities. Permissions will not be unreasonably withheld but consideration will need to be given to the scope and remit of the role and how this may be perceived in the context of your IPCC position. You should discuss with your line manager if you are considering becoming politically active, for example:

- Campaigning for a political party.
- Holding a political office.
- Occupying party political posts.
- Holding a particularly sensitive or high profile unpaid roles in a political party.

If you are in a politically restricted post and another person resident at the same address as you is politically active, you need to ensure that your own political impartiality is not compromised and should seek advice if necessary from the Head of HR or the Chief Executive in such circumstances.

9 BREACHES OF THE CODE OF CONDUCT

The Code of Conduct and IPCC policies provide the standard against which all staff behaviour should be measured. Any breaches of the code will be subject to investigation and serious breaches may lead to disciplinary proceedings.

9.1 Conflict at Work

The IPCC has a range of support tools and processes in place for members of staff who feel they have been the victim of bullying or harassment at work to support and enable them to appropriately raise and challenge this behaviour. If you feel you have been a victim of such behaviour, the Conflict and Dispute Resolution Policy details how to raise such issues. Further support and guidance can be sought from line managers, trade union representatives, Staff Council Representatives and the Employee Assistant Programme (EAP).

Where a complaint is made between members of staff, the IPCC uses a conflict and disagreement resolution process, with an emphasis placed on achieving a mutual resolution as opposed to apportioning blame. The first stage of any such process is to attempt to resolve the process swiftly and amicably through informal action.

Unacceptable behaviour can only be addressed where the victim or witnesses make a complaint. Action cannot be taken against unconfirmed or anonymous allegations.

Further details on the available support and relevant processes can be found on iNet. Alternatively please consult an FCA for advice.

9.2 Employee Involvement and Management Direction

Employee involvement in discussion and debate is a healthy part of the IPCC achieving robust decision making and planning, although final decision must rest with the accountable manager(s). You can refer to the IPCC's agreed Scheme of Delegation for further details of who holds specific delegated authorities.

You are expected to follow management direction where it has been given. Where you do not agree with or understand why a decision has been taken, in the first instance you should ask the accountable manager for an explanation. Should this not resolve the matter and you still feel that the management direction is either unreasonable you should consult the Conflict Resolution and Grievance Policy for further guidance.

9.3 Use of Alcohol or illegal drugs

In keeping with the expectation that IPCC staff always act professionally, you cannot drink alcohol during your working hours (including during meal breaks). This includes times at which you are on-call or representing the IPCC externally. The only exception to this rule

would be where Director approval has been sought ahead of attending a work related function.

If you are not on call, but have consumed alcohol and are then contacted to undertake IPCC work, you should make the instructing manager aware of the circumstances.

If you are at work under the influence of alcohol or illegal drugs, then that will be regarded as a serious disciplinary matter. If you are prescribed drugs which may affect your ability to do your job, then you should seek advice from your line manager on the health and safety implications of this at the earliest opportunity.

9.4 Whistle blowing

In the event that you have a significant concern about an IPCC related matter that you feel unable to raise with your line manager, please refer to the [IPCC Internal Whistle blowing Policy](#) for further information relating to this subject.
