**AMENDMENT TO THE HRA CODE OF CONDUCT**

**INFORMATION PAPER FOR STAFF**

**June 2015**

**HRA – Policy Review Sheet**

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| Name of Policy or Procedure | Code of Conduct |
| **Content Review: Individual Responses** |
| Titles as opposed to names should be used in the for sheet (JW) | Agree. Amended. |
| The headers and footers require review  | Agree. Amended. |
| Information may be included on the frequency of signing, what happens if you don’t sign?, where are copies kept, etc. | Agree. A protocol will be drawn up to complement the Code. |
| Should Freedom of speech be referenced (unsure if incorporated into the recent rewrite of the Whistle Blowing)? Why are these policies being listed as the majority of the HRA policies and procedures would be relevant? E.g. fraud | Disagree. Think this is a reference to Freedom of Information policy and as such is not relevant.Agree. Majority of HRA policies are relevant but list of policies given are deemed to be of direct relevance. |
| Personally it seems to be pitched at a high level – the code talks about ‘providing information to Minsters of options and facts’, ‘dealing with public and their affairs’,’ taking decisions on the merit of the case’ . Would this be relevant to the vast majority of staff working at the HRA? care should be taken that staff are reticent to sign because they feel that the explanations (detailed in bullet points) are not relevant to their work Could the code not be written to be relevant to working at the HRA – more chance of greater ‘buy in’ and a move away from a tick box exercise. The principles (which I imagine are in the cabinet model) are sound; it’s just the bullet points. | Partially agree. The Cabinet Office’s model code for staff has already been amended to reflect HRA requirements but agree further amendments to make it more user friendly can be incorporated. |
| How is political activity being addressed? | Agree. Will include in section on Impartiality. |
| The additional expectations are pulled from some policies, but not others, would it not be better to just detail an expectation that that responsibilities with all policies should be adhered to? I think the issue here is the signing of this document and to adherence to the additional expectations – such as wearing you name badge. | Partially agree. Wearing your name badge is included in the HRA Dress Code but agree reference to adherence to all HRA policies should be included. |
| Nominated officer – who is this? | Agree. Amended to HR |
| Reporting criminal offences to the police – I think this is as odds with current version of whistleblowing  | Disagree. Current policy refers to reporting to outside agencies including the police. |

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| Should we be looking for commitment/loyalty, too? | Disagree. They should be considered in work determining HRA values. |
| “Fiduciary obligations”. Not sure everyone will understand this terminology? | Agree. Will amend explanation further. |
| What is required action if contacted by the media? Expand?  | Disagree. Feel the Code covers initial requirement sufficiently and Communications department guidance and support will cover individual circumstances. |
| Should we add something about treating colleagues with respect and courtesy? I’m thinking of where two people may not particularly like each other/get on, but need to be mature about how they interact within the office | Agree. Will include in reference to equality and diversity. |
| Perhaps also need to reference the Dress Code to ensure staff (and in particular new staff) are aware of this / reminded  | Agree. Already referenced in related documents. |
| Add reference to social media along the lines of ‘ staff must behave responsibly in relation to social media, only comment on issues of relevance to HRA in a professional capacity where you have permission to do so and to conduct themselves in such a way as would not bring the HRA into disrepute | Agree. Incorporated  |
| There is no reference to what Code of Conduct REC Members should follow, though they are referenced in paragraph 1. It is stated that this policy is applicable to directly employed staff etc. in paragraph 2. The information in page 2 above is useful as it states which Code of Conduct REC Members should adhere to. | Agree: Will provide some clarity. |
| Is there a Code of Conduct for secondees and contractors who do not provide a service fundamental to achieving the HRA’s business objectives? If so where/what is it? Is it even likely that we will employ people who aren’t fundamental to achieving the business objectives? | Partially agree: There is no code for this type of worker as they will be very limited and specialised i.e. electrician or plumber and will not require a code. |
| Under “Additional Expectations” we are expected to: “not conduct private business on HRA premises or in paid time. This is forbidden unless official permission is obtained from the appropriate senior manager”. When is it likely that permission would be obtained from a senior manager? Is this referring to arranging an emergency appointment at the doctors, for example? | Disagree: Requirement for permission is explicit enough and arranging an emergency appointment at the doctors is, we suggest, not a good example of conducting private business. |
| I get the impression that if people do not adhere to the Code of Conduct that the Disciplinary Policies and Procedures would apply but it is not clear. If this is not the case then what will happen if the Code is not adhered to? The next section, Rights and Responsibilities, also does not state what will happen. | Disagree: the Code does state that it is part of the contractual relationship with the HRA but it is not felt that mentioning sanctions would be appropriate in a document of this nature. However, if a breach of contract does occur, it would be managed through the existing HRA Disciplinary Policy and Procedure |
| I think it’s worth reviewing the use of term integrity.   In the standard dictionary definition, integrity means acting in an ethical way [should this not be part of our definition!?] and also of being undivided. In the NOLAN principles on the .gov website, this term particularly implies avoiding inappropriate influence or distractions: Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships. <https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>  | Agree. Reference to acting in an ethical way included.Disagree. Feel “accept gifts or hospitality or receive other benefits from anyone which might reasonably be seen to compromise your personal judgement or integrity” is sufficient to cover this point, in addition to Declaration of Interests policy. |
| As it happens, the HRA definition for integrity in this code of conduct is covered in the NOLAN principles under “selflessness”. Impartiality is included under objectivity in the NOLAN principles. The NOLAN principles include the additional point of leadership - modelling good behaviour with the expectation that people lead by example.  This puts the impetus back in the hands of all staff and sets up positive expectations of everyone. As the terms in the HRA list already very closely match the NOLAN principles (selflessness, integrity, objectivity, accountability, openness, honesty and leadership), and NOLAN is the general standard expected for those in public office in the UK, would it not be simpler to directly use the NOLAN principles/definitions as a basis for this section?  Any point that doesn’t snugly fit alongside it could be moved to the Additional Expectations section. Considering you are asking people to sign this, it would be sensible to base the General Standards of Conduct on the NOLAN principles as these have been agreed and discussed at length at a higher level and are therefore beyond dispute.  | Fully understand reference to the NOLAN principles. The issue we face is that in our Framework Agreement with the Department of Health it states:“HRA has a code of conduct for board members and a separate code for all staff, (including contractors and agency staff) and volunteer REC members who will comply with the principles in the Cabinet Office’s model code for staff of executive non-Departmental public” …..so we must demonstrate we are asking people to comply with those standards. |
| The main criticism of our original Code of Conduct for Bristol was that the tone was considered oppressive and overbearing, rather like being told how to behave at school.  I’d consider that this is perhaps true of this code of conduct too.  In our second draft for Bristol (v2 office etiquette) we lightened it up a little based on the expectation that people that people are generally good natured and just need pointing in the right direction now and again. | Agree. Though we follow the Cabinet Office’s model code we have attempted to ‘lighten’ it up a bit. |
| The final sentence “You can take pride in living up to these values” in its current context seems a little blunt!  Perhaps it would be nicer to say, “The HRA hopes you can take pride in living up to these values” | Agree. Will amend. |
| Does signing the Code imply that a wet signature is required? I have no issue with the code of conduct but I, as a manager, would find it helpful to understand how when one is a home based worker and often on the move how one is supposed to retain signed copies of any documents. I usually PDF and save electronically. It would help if there was specific guidance - maybe there is and I have missed it. | Agree. A wet signature will not be required and a protocol will be drawn up to complement the Code. |