

Code of Conduct for Employees.

1. Introduction.

- 1.1** This Code of Conduct incorporates existing policies, regulations and conditions of service and provides further guidance to assist employees in their day-to-day work. The Code is based on the recommendations of the Nolan Committee on the Standards of Conduct in Local Government in England, Scotland and Wales and has been agreed with all Trade Unions representing all employees within Glasgow Life. The Code applies to employees' conduct both within the Company and when dealing with other organisations as a representative of the Company. The Code also makes employees aware of their individual responsibility defined in the Bribery Act 2010. The principles detailed below are the basic ones governing all Glasgow Life employees but senior managers may wish to issue further guidance specifically relating to his/her service requirements which will supplement but not contradict the basic principles contained in this Code. It is not intended that these principles will impinge in any way on the requirements set down by any employees' professional body.
- 1.2** The Code does not affect an employee's rights and responsibilities under the law; its purpose is to provide clear and helpful advice. Because of the nature of their work, parts of the Code may apply to some employees more than others, but all employees must comply with the Code. A breach of the Code may give rise to disciplinary action, which will be taken in accordance with the Company's Code of Discipline. As far as possible, employees must also comply with the Code of Conduct if they are appointed as a representative of the Company on any organisation, trust or company.
- 1.3** The Code incorporates "The Seven Principles of Public Life" identified by the Nolan Committee on Standards in Public Life. These are listed below:

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1.3.1 Selflessness

Employees should not take decisions, which will result in any financial or other benefit to themselves, their family, or their friends. Decisions should be based solely on the Company's best interests.

1.3.2 Integrity

Employees should not place themselves under any financial or other obligation to an individual or an organisation, which might influence them in their work with the Company.

1.3.3 Objectivity.

Any decisions, which employees take in the course of their work with the Company, including making appointments, awarding contracts, or recommending individuals for rewards or benefits, must be based solely on merit.

1.3.4 Accountability.

Employees are accountable to the Company as their employer. The Company, in turn, is accountable to the public.

1.3.5 Openness.

Employees should be as open as possible in all the decisions and actions that they take. They should give reasons for their decisions and should not restrict information unless this is clearly required by Company policy or by the law.

1.3.6 Honesty.

Employees have a duty to declare any private interests, which might affect their work with the Company.

1.3.7 Leadership.

If they are in a managerial position, employees should promote and support these principles by their leadership and example.

1.4 Bribery Act .

The Code incorporates offences relating to being bribed as defined in section 2 of “The Bribery Act 2010” where the employee would be liable. These are listed below: -

- 1.4.1** Where an employee requests, agrees to receive or accepts a financial or other advantage intending that in consequence a relevant function or activity should be performed improperly (whether by the employee or another person).

- 1.4.2** Where an employee requests, agrees to receive or accepts a financial or other advantage, and the request, agreement or acceptance itself constitutes improper performance by the employee of a relevant function or activity.
- 1.4.3** Where an employee requests, agrees to receive or accepts a financial or other advantage as a reward for the improper performance (whether by the employee or another person) of a relevant function or activity.
- 1.4.4** Where, in anticipation of or in consequence of an employee requesting, agreeing to receive or accepting a financial or other advantage, a relevant function or activity is performed improperly by the employee or another person at the employee's request or with the employee's assent or acquiescence.

2. The following areas are where these principles apply.

2.1 Standards.

Employees are expected to give the highest possible standard of service to the public, and where it is part of their duties, to provide appropriate advice to the public, other partners and fellow employees with impartiality.

Employees will be expected to bring to the attention of the appropriate level of management any significant impropriety or breach of procedure which would impact on the provision of the service. More detailed guidance is contained within the Company's Policy on Whistleblowing.

2.2 Recruitment.

2.2.1 Employment of Relatives/Disclosure of Relationships.

Employees involved in appointments must ensure that these are made on the basis of merit. It is unlawful for an employee to make an appointment, which was based on anything other than the ability of the candidate to undertake the duties of the post. If employees are conducting interviews as part of their job, they must disclose, prior to the interviews taking place, any relationship known to exist between them and the candidate for interview.

This should be reported to their Line Manager in the first instance. Advice on the application of this paragraph is contained within the Code of Practice on Recruitment and Selection for Appointment or Promotion. No relative of a Director shall be offered an appointment in the Company without consultation with the HR Manager and/or Chief Executive.

No relative of the Chief Executive shall be offered an appointment in the company without the prior consent of the Board.

Employees must also not be involved in decisions relating to discipline, promotion or pay adjustments for any other employee who is a relative, partner, etc.

2.2.2 Canvassing of Board members or Employees of the Company.

Canvassing of members or employees of the Company directly or indirectly in connection with any appointment within the Company, will disqualify the candidate. Employees must not solicit for any person for any appointment within the Company or recommend any person for such appointment or for promotion. This, however, will not prevent them from giving a written testimonial of a candidate's ability, experience or character for submission to the Company with an application for appointment.

2.3 Relationships.

2.3.1 The Public.

Employees should always remember their responsibilities to the community which they serve and ensure courteous, efficient and impartial service delivery to all groups and individuals within that community. Each member of the public should be dealt with fairly, equitably and consistently in line with the Company's Equalities Policy.

2.3.2 Political Groups.

Political groups may sometimes seek advice from Company employees. Employees must follow the Company's procedure, detailed below. The office bearers (of the group) must first approach the Chief Executive or relevant Director and employees should check whether this has happened. If not they should refer the matter to the Chief Executive or relevant Director.

The office bearers must tell the Chief Executive what type of advice they are seeking.

The Chief Executive will decide whether attendance at the meeting is appropriate and which employee or employees should attend and notify them accordingly. Once the employee has given the advice to the group the employee must leave the meeting before any decision is made. The employee must observe strict confidentiality. The discussion in one political group should not be disclosed to another political group or to any member of such a group.

2.3.3 Access to Councillors.

Employees are entitled to raise with their Councillor any complaint which they have about the services of the Company. If their complaint concerns any aspect of their work with the Company, however, they must make use of the Company's Grievance Procedure.

2.3.4 Fair and reasonable treatment at work.

Employees are entitled to expect fair and reasonable treatment from their colleagues, managers and from the public. If employees feel that they have been unfairly treated or have been discriminated against, they are entitled to make use of the *Company's Harassment Policy, Grievance Procedure and/or Whistleblowing Procedure*.

There may be rare occasions when they feel that they have been required by a colleague, a or a member of the public, or by an organisation, to act in a way which might be illegal, improper or unethical, or which is otherwise in conflict with the principles of this Code of Conduct. They must inform their line manager accordingly.

2.3.5 Contractors.

Orders and contracts must be awarded on merit, by fair competition against other tenders, and no special favour should be shown to businesses run by, for example, friends, partners or relatives in the tendering process. All relationships of a business or private nature with external contractors, or potential contractors must be made known to the appropriate manager. No part of the local community should be discriminated against.

In addition, if as part of their normal duties, employees engage or supervise contractors or have any other official relationship with contractors and there has previously been or currently is a relationship in a private or domestic capacity with the contractors, they must declare this relationship to their appropriate line manager.

In accordance with the Company's Conditions of Service, the Chief Executive and Directors are required to submit annual declarations of interest and to notify the Chief Executive in writing of any change of circumstances as soon as that change has occurred.

This also applies to certain other Officers in posts below the rank of Chief Executive/Director particularly those involved in competitive tendering. Employees must be fair and impartial in their dealings with contractors, sub-contractors and suppliers.

If employees are involved in the tendering process they must follow the Company's procedures and rules about tenders and contracts. In particular, if any employees are contemplating a management buyout, they must, as soon as they have formed a definite intent, inform their appropriate manager and withdraw from the contract awarding processes. If employees have both a "client" and "contractor" responsibility in the tendering process, they must observe the requirement for accountability and even-handedness in undertaking these two roles. If they have access to confidential information on tenders or costs for either internal or external contractors, they must not disclose that information to any unauthorized individual or organisation.

2.3.6 Conflicts of interest.

Company employees must not allow any private interest, financial or non-financial, to influence their decisions. They must also not use their position to further their own interests or the interests of others who do not have a right to benefit under the Company's policies.

Employees may have a private interest, which relates to the work of the Company. That interest may be a financial one or one, which a member of the public might reasonably think, could influence their judgement. In addition, close family members or people living in their household may have financial interests in the work of the Company. All such interests must be declared to the employee's line manager.

If an employee is a member of an organisation or a club, and membership might result in a conflict of interest in relation to any aspect of their work with the Company, the onus is on them to declare this membership to their line manager. This applies equally to membership of organisations or clubs, which are not open to the public (e.g. Freemasonry).

Any such declaration of interests should be recorded in a register by the line manager.

In addition all employees who sit on the boards of external bodies, or who are involved with them are required to submit annual declarations of interest if they are involved in the any of the following areas of work:

- The provision of advice to external organisations on the availability of grant funding and assistance with applications for such assistance
- Assessment of applications for grant funding
- Grants administration
- Monitoring of external organisations which receive grant funding from the Company.

They are also required to notify the Chief Executive in writing of any change of circumstances as soon as that change has occurred.

2.4 Acceptance of Other Remunerative Employment/Private Professional Practice.

Chief Executive and Directors aside, no restriction shall be placed on employees undertaking other employment of a remunerative nature outwith normal working hours, provided the additional employment does not interfere with or impair their ability for the efficient execution of their duties within the Company's service.

- Employees shall not engage, however, in work for any individual firm or body where the Company has been, or could be involved in the transaction or other business, or where the work in any other way impinges on the Company's interests.
- Employees must not do private work for submission to any Section of the Company, nor act for any person who is in negotiation with the Company, in view of the possibility of conflict of interest and the implications which might be taken from such action.
- The onus is on employees to ascertain whether any conflict occurs and to raise the matter in the first instance with their senior manager.
- If employees wish to market, patent or otherwise exploit ideas, inventions, or other products, where they are using knowledge or information gained in the employment of the Company, they must advise their senior Manager accordingly.

2.5 Other Outside Duties or Services during Business Hours.

2.5.1

During the period of their employment, employees will not be permitted to hold any outside office, position of employment, the duties of which would entail their absence from work during normal business hours, without the consent of the Chief Executive but this instruction does not debar a senior manager from authorising an employee:-

2.5.1.1 To be absent occasionally and temporarily during business hours to attend to duties or services of an honorary, charitable or philanthropic character, so long as these do not interfere with efficient discharge of Company duties, or

2.5.1.2 To take leave of absence during office hours for similar duties or services.

All employees may accept invitations to undertake lectures appropriate to their professional qualifications. Where such lectures are given out with normal office hours, or are given within normal office hours, but are of an infrequent nature, any fees may be retained. For lectures given within normal office hours, where the lectures cover a given period of pattern, prior permission must be sought from the relevant director and any fees that received, excluding out-of-pocket expenses, must be paid to the Company or the time off must be set against the employee's annual leave entitlement.

2.6 Openness and Disclosure of Information.

2.6.1 The Company's decision making process must be transparent and open. The Company must provide the public with clear and accessible information about how it operates. It must also ensure that there is an effective complaints procedure in place for the public to use when things go wrong.

2.6.2 The Company's policy is that in general information will be made available. There are exceptions, however, to this principle of openness where confidentiality is involved, and information may be withheld if, for example, it would compromise a right of personal or commercial confidentiality. This does not apply where there is a legal duty to provide information. Employees must not break the law in this area.

In particular, information must not be supplied concerning employees to any person outwith the service of the Company unless the consent of the employee is first obtained. This will not apply where there is a statutory duty to provide information, e.g. Inland Revenue, DSS etc. or in the process of prevention or detection of fraud, as detailed below. If there is any doubt employees should raise the matter with their line manager.

2.7 Fraud Detection and Misuse of Resources.

2.7.1 Fraud Detection.

The company have a responsibility to prevent fraud. Any information collected by the Company will be used and disclosed where necessary to prevent and detect fraud. It will also be shared for the same purpose with Public Bodies or other Organisations which handle Public Funds. This is covered under the criteria laid down by the Data Protection Act 1984. Action may also be taken under the Company's Code of Discipline against any Company employees detected fraudulently completing Council Tax /Housing Benefit forms.

2.7.2 Corruption.

It is important that employees are aware that it is a serious criminal offence for them corruptly to receive or give any gift, loan, fee, reward or advantage for doing or not doing anything, or for showing favour or disfavour to any person, in the course of their work with the Company. If an allegation is made, it is for them, as employees, to demonstrate that any such rewards have not been corruptly obtained.

2.7.3 Use of Financial Resources.

Employees must ensure that public funds entrusted to them are used in a responsible and lawful manner. They must strive to ensure value for money to the local community and to avoid legal challenge to the Company.

2.7.4 Use of Other Resources.

All employees serve the public, and they must remember the seven principles when they use Company equipment, materials and resources, in order to ensure value for money.

Employees must not breach the policy of the Company on the personal use of Company equipment. In particular, guidance has already been issued entitled “Security Guidance for Computer Users” and it stresses that the Company and its employees are legally required to follow good security practices by :

- Keeping personal data secure (Data Protection Act)
- Only using licensed software (Copyright, Designs and Patents Act)
- Not attempting to gain unauthorised access to data and systems (Computer Misuse Act).

2.7.5 Further information can be found within the Company’s Policy on Whistleblowing.

2.8 Hospitality.

2.8.1 Employees must follow the Company's policy on declaring offers of hospitality and follow the current procedures for having any offers authorised, as detailed in the attached Appendix 1.

2.8.2 Sponsorship - Giving and Receiving.

Where an outside organisation wishes to sponsor or is seeking to sponsor a Company activity, whether by invitation, tender negotiation or voluntarily, the basic conditions concerning acceptance of hospitality or gifts apply. Particular care must be taken when dealing with contractors or potential contractors.

Where the Company wishes to sponsor an event or service, no employee, or their partner, spouse or any relative may benefit from such sponsorship in a direct way without there being full disclosure to their line manager of any such interest. Similarly, where the authority through sponsorship, grant aid, financial or other means, gives support in the community, employees must ensure that impartial advice is given and that there is no conflict of interest involved.

2.9 Contacts with the Media.

All contact with the media should normally be directed through the Company's Media Team who will deal with enquiries from the press. Members of the Senior Management Team can, however, speak to the media only on issues related to their direct area of responsibility, with advance guidance sought from the Media Team. Employees in any doubt regarding this should contact their immediate line manager or the Media Office on 0141 287 5970.

2.10 Public Statements.

Employees are entitled to express their views about the Company, provided they do not make use of any private information gained through their work with the Company. But, in their work capacity, they must not criticize the Company either through the media or at a public meeting, or in any written communication with members of the public.

2.11 Social Networking Sites.

2.11.1 Employees should comply with the Company's Social Media Guidance for Staff. Breach of that policy may result in disciplinary action being taken in line with the Company's policies and procedures.

2.11.2 Employees should specifically note that ;

Offensive or derogatory comments about Glasgow Life, its staff or customers/users via personal social networking pages are unacceptable and may result in disciplinary action being taken in line with the Company's policies and procedures.

Any behaviour which impacts on employment with Glasgow Life, for example statements which are bigoted, hateful or discriminatory, may result in disciplinary action being taken in line with the Company's policies and procedures.

2.12 Conditions of Service.

All employees are governed by the Company's Conditions of Service. Copies of the Company's Conditions of Service and HR Policies and Procedures are available for inspection within the company.

APPENDIX 1

Hospitality/Acceptance of Gifts.

1. Introduction.

1.1

The information contained in this Appendix relates to the Codes of Conduct for employees and should be read in conjunction with the relevant Code. Whilst there are no hard and fast rules in this area, the following guidelines should provide Officers with appropriate ways of dealing with the situations they may find themselves in regarding hospitality and gifts.

2. Hospitality offered to Officers.

2.1 Guidelines on the Receipt of Hospitality.

The receipt of hospitality by Officers should only be accepted when it is clearly in the Company's interests. It is essential that any suggestion of improper influence should be avoided. Hospitality must not be accepted knowingly during the tendering period of a contract and Officers should always be aware of the possibility that the contractor/consultant offering hospitality may be tendering for a contract elsewhere in the Company. The clear rule of thumb is that when in doubt politely refuse.

2.1.1 The following examples give general guidance on acceptable and unacceptable hospitality:

2.1.1.1 Generally Acceptable.

- A working lunch provided to allow the parties to discuss business, though it should be remembered that lavish provision could well raise questions.
- Attendance in an official capacity at functions to which invitations have also been sent to representatives of other organisations.
- Attendance in an official capacity at functions arranged by public utilities and public authorities.

2.1.1.2 Generally Unacceptable.

- The provision of holiday or weekend hospitality.
- The use of a company flat or hotel suite.
- Lunch with a developer whose application is awaiting consideration by the Company.
- An invitation to join other company guests at events involving lavish hospitality.
- When a matter such as arbitration arises from a contract, **any** offer of hospitality should be refused even if, in normal circumstances, it would come within the acceptable category.
- Repeat invitations by the same organisation/individual.

2.2 Guidelines on the Receipt of Gifts.

It is important to be careful when gifts are offered by organisations (or their representatives) which are able to provide work, goods or services to the Company or which seek authority (e.g. license,) from the Company to carry out their businesses. In general, therefore, an Officer should politely refuse any personal gift offered to them or to any member of their family by any person or body when has, or seeks to have, dealings with the Company.

Gifts that may be accepted include:

2.2.1.1 Small gifts of a promotional or advertising character, which are often given to a wide range of people, e.g. calendars, diaries, pens, charts and other similar articles;

2.2.1.2 Small gifts given on the conclusion of a visit to factory, firm, community organisation or voluntary group of a type normally given by the organisation concerned, or where a contractor wishes to mark the completion of a new building, when such gifts are made to a number of people on the same occasion or as part of a normally accepted practice.

2.2.1.3 Small gifts where refusal would cause needless offence and the giver is not seeking a decision or business from the Company but merely wishes to express thanks for advice, help or co-operation received.

2.2.2 An exception is an expensive gift from a foreign visitor, which should generally be accepted since refusal might give offence. However, such gifts should not normally be accepted personally and should be treated in an appropriate fashion. The Company should retain ownership and safeguard the gifts or display them.

2.2.3 Where a gift is personal, valued at less than £20 and cannot be used by the Company, it may be accepted by an individual. However, Officers should accept no personal gifts unless declared to and approved by the relevant Director or senior manager.

2.2.4 Gifts of alcohol, hampers of food or other articles which could be misinterpreted by the public or assume a more serious importance in any form of future enquiry or investigation, should not be accepted. There may, however, be limited circumstances when it would be appropriate to accept such gifts and to pass them on to a charity. In these cases the giver's approval should be sought.

2.2.5 A register recording the receipt of gifts (and hospitality) will be maintained by the Chief Executives Office held by Chief Executives PA on the Gifts and Hospitality Register (see Appendix 2). Officers should immediately notify their Director/Head of Service of any gifts or hospitality received and enter the relevant details in the register. The Director/Head of Service must decide whether it is appropriate to accept the gift or hospitality or, if a gift, whether it is necessary to return it. Clearly any gift returned to the sender should be accompanied by a courteously worded letter explaining why the gift or hospitality may not be accepted. The return of a gift or its presentation to charity must be recorded in the register.

2.2.6 This is a very sensitive area and Officers should operate on the basis that if they have any doubt then hospitality should be politely refused. In any case, the offer of or receipt of gifts or hospitality must always be reported to the Chief Executive.

2.4 In summary, if an Officer is offered gifts or hospitality s/he must: -

2.4.1 Decide how to respond bearing in mind the guidance above whilst remembering that it is easy for the receipt of gifts, hospitality and entertainment expenses by Officers to give rise to misconceptions. There must be no scope for accusations of bribery and corruption. The Chief Executive will be able to advise if individuals are uncertain on how to proceed.

2.4.2 Report the offer or acceptance of gifts or hospitality (excluding small gifts) to the Chief Executive, who will maintain a record.

3. Hospitality offered by Officers.

3.1 Within the Company Premises.

3.1.1 It may be appropriate on occasions for Officers to host a reception for a number of individuals and for refreshments to be provided from the Company budget. In such circumstances:

3.1.1.1 The reception should be relevant to the business of the Company.

3.1.1.2 Where Officers are involved, the relevant Director's approval should be obtained in writing.

3.1.1.3 All reasonable steps should be taken to ensure that costs are kept to a minimum and that they are appropriate to the occasion.

3.1.2 Each Director will keep a register with details of the purpose and aims of functions together with the guest lists for future reference as required. Such registers will be available for inspection by the Chief Executive or Director of Finance.

3.2 Out with Company Premises.

3.2.1 Wherever possible meetings between Officers and other individuals should take place in Company premises. In exceptional circumstances when such a meeting needs to be held over lunch or dinner or when some other form of hospitality is necessary all reasonable steps should be taken to ensure that costs are kept to a minimum. The same applies to meetings held with individuals or representatives of outside bodies to discuss Company business over lunch or dinner.

3.2.2 Expenses claims for lunches, dinners and other similar hospitality must only be made by Senior Officers if the subject(s) under discussion relate to Company business not private or party political matters.

3.2.3 If there is any doubt about the propriety of a particular claim or whether or not a subject relates to private or party political matters, advice should be sought from the Chief Executive.

3.2.4 When submitting a claim, Officers should include details of the individual(s) for whom hospitality has been provided, together with the purpose and aim(s) of the meeting. These details will be kept in a register for future reference as required.

APPENDIX 2

GLASGOW LIFE

RECEIPT OF GIFTS AND HOSPITALITY REGISTER

NAME OF EMPLOYEE OR DIRECTOR

JOB TITLE

Date offered	Date of Event	Offered by	Offered to	Description of Gift / Hospitality	Value (Actual or estimated value if > £100)	Accepted/declined	Comments	Date of Approval

Signature of Employee

Date

Authorisation of Chief Executive or Director

Date
