



## Code of Conduct

### Introduction

Maintaining the Delivery Authority's integrity is critical to achieving our vision to transform the Houses of Parliament to be fit for the future as the working home of our Parliamentary democracy, welcoming to all and a celebration of our rich heritage. This Code of Conduct (our Code) provides guidelines on the expected standards and behaviours in a range of situations, including social events and out-of-hours activities.

We will keep our Code under review and update it when necessary, particularly in light of regulatory or legislative changes.

### Supporting aims

Our Code deals with a range of situations relating to workplace conduct, but it is not intended to be exhaustive. The following supporting principles should be followed for you to fulfil your activities to ensure we are:

- Fully compliant with relevant laws and regulations.
- Respectful of confidentiality of personal, Parliamentary and Programme information.
- Promoting equality, diversity and inclusion, and always treating all colleagues fairly and with due respect.
- Maintaining a safe and healthy environment for colleagues to work in.
- Proactively managing our responsibilities to the environment.

### Scope

Our Code applies to everyone working on our behalf – whether you are a directly employed colleague, an agency, interim, or an independent contractor acting on our behalf in another capacity.

It is your responsibility to familiarise yourself with the details of our Code. If you have any queries, speak with your line manager in the first instance. Other policies and procedures are referenced in our Code and the extent to which these will apply to you depends on your employing organisation.

### Principles of public life

Our Code has been produced in line with the Seven Principles of Public Life, also known as the Nolan Principles, which are the basis of the ethical standards expected of public office holders. They are as follows:

1. **Selflessness** – act solely in terms of the public interest.
2. **Integrity** – not act or take decisions in order to gain financial or other material benefits for yourselves, your family, or friends. Any interests should be declared.
3. **Objectivity** – act and take decisions impartially, fairly and on merit, without discrimination or bias.
4. **Accountability** – be accountable to the public for your decisions and actions.
5. **Openness** – act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.



6. **Honesty** – be truthful.
7. **Leadership** – actively promote and robustly support these principles and be willing to challenge others.

## Handling information

You may have access to confidential and sensitive information in relation to the Delivery Authority, Sponsor Body, Government and/or Parliament as a result of the work you are undertaking on behalf of the Programme. It is therefore important to always handle it appropriately, whatever the format. The main test for you to ask yourself is if it were to be lost or compromised, would it have a detrimental effect on our operations, reputation, confidentiality, or the personal security of colleagues associated with the Delivery Authority. If the answer to this is yes, then you must make sure it is stored securely and where applicable, password protected to control access. Permission should be sought through your line manager to remove any sensitive information in whatever format away from any of the Delivery Authority places of work and must not be shared through a personal email account.

We use the *Parliamentary Protective Marking Scheme (PPMS)* for all our documents or emails, and we ask that where possible, you share links to documents rather than sending them as attachments. Further details are available in the *Acceptable Use of Digital Services Policy*.

If you don't follow our requirements when handling sensitive information, you could face action being taken in accordance with your employer's *Disciplinary Policy and Procedure*.

## Conflicts of interest

When acting on our behalf, try to avoid any situation that could have the potential to undermine your impartiality, due to a clash between your professional, public, or own self-interest. Where there could be a conflict of interest, discuss this with your line manager or key point of contact in the first instance so that you are not or are not perceived to be involved in decisions you could influence inappropriately. This includes declaring any known interests, connections, or relationships (whether personal or professional) with anyone also involved with the Programme. Where there is an interest that needs to be declared, this should be recorded in the register maintained by our General Counsel.

If you don't tell your line manager or key point of contact about an interest that later has an impact on your impartiality, you could face action being taken in accordance with your employer's *Disciplinary Policy and Procedure*.

## Political impartiality

We expect you to undertake your role and responsibilities with complete political impartiality and you should not attempt to influence others through personal political opinions or preferences.

You won't normally be given permission to participate in political activity that could result in you being in the public eye. Any requests to participate in such activities should be made to your line manager or key point of contact, who will assess each request to determine if it's appropriate that you participate. However, where it is clear that you can still fulfil your obligations to us and remain impartial, permission may be granted. Where a request is declined, the decision maker will give you a clear explanation.



If you decide to ignore the decision and participate, we will take this very seriously and it could result in action being taken in accordance with your employer's *Disciplinary Policy and Procedure* and this may lead to your engagement with us ending.

## Data protection

We hold and process information on our employees and various data subjects purely for administrative or commercial purposes. We will only collect and handle data for "legitimate interest" and in compliance with the Data Protection Act 2018. If you are entrusted with data of any kind, you must keep it secure, maintain confidentiality and only use it for the purpose for which it was intended, and comply with our *Data Protection Policy*.

## Acceptance of gifts and hospitality

We are not normally able to accept gifts or hospitality as this can often be seen as a bribe or reward. However, you can seek permission from your line manager to accept a gift or hospitality where this will enhance the relationship with the provider to the benefit of the Programme and not for your personal gain. Further details can be found in our *Gifts and Hospitality Policy*.

## Fraud and bribery

We have a zero-tolerance approach to acts of fraud, dishonesty, bribery, corruption, theft of assets or improper disclosure of confidential information and this is reflected in our *Fraud and Bribery Policy*. In addition, acts of bribery could also lead to criminal proceedings in accordance with the *Bribery Act 2010*. Any proven acts of fraud, dishonesty, bribery, corruption, theft of assets or improper disclosure of confidential information could result in your engagement with us ending or for direct employees, be dealt with in accordance with our *Disciplinary Policy and Procedure*.

## Modern slavery

We are committed to ensuring all our business activities are completed in an ethical manner and with the utmost integrity. We will implement appropriate mechanisms aimed at preventing modern slavery from occurring in our own business activities and/or in any of our supply chains. Further details can be found in our *Modern Slavery Statement*.

## Whistleblowing

We are committed to adhering to the highest standards of honesty, transparency, and accountability. It is essential that colleagues working on the Programme share our commitment and feel able to raise concerns confidentially, to enable appropriate action to be taken. Further details are in our *Whistleblowing Policy*.

## Respect and dignity at work

We actively promote respect, dignity at work and the ability to challenge unacceptable behaviour in our workplace. You can raise any concerns relating to harassment, bullying, victimisation, and discrimination in our workplace through our *Grievance Policy and Procedure*.

The *UK Parliament Behaviour code*, which makes clear the standards of behaviour expected of everyone within the parliamentary estate, also applies to you. Further details can be found [here](#).



## Criminal offences

We ask that you are mindful of your general conduct and behaviour outside of work. You should not take part in an activity or make any public statement which compromises, or might be seen to compromise, your engagement with us.

You must maintain the appropriate level of security clearance throughout your engagement with us, so you need to let us know if anything changes that could affect this. Should you be under investigation for a criminal act or be convicted of an offence (excluding speeding or parking violations), or receive a police caution, you must tell your line manager or key point of contact as soon as reasonably practicable. Being charged with or convicted of a criminal offence doesn't necessarily mean your engagement with us will automatically end. In these circumstances we will review what has changed to see whether it could have an impact on your security clearance and therefore your ability to remain working on the Programme. If it does, this could result in your engagement ending, or for direct employees, dismissal in accordance with our *Disciplinary Policy and Procedure*.

## Conduct outside of work

As a rule, what you do after working hours and away from work is your own business. However, we will become involved in any issues arising from the following circumstances:

- At office parties, drinks events and other work-related social occasions.
- At third-party (that is, clients and customers) occasions where you have been invited in your capacity as a representative on our behalf.
- At work-related conferences and training courses.
- Any defamatory comments made about the Delivery Authority and/or the Restoration and Renewal Programme in any capacity via social media.

Our policies and procedures will continue to apply at all these events and if you are acting on our behalf, you should not do or say anything that would bring us into disrepute. Improper behaviour will lead to us investigating the matter and possible disciplinary action. For further information, refer to our *Disciplinary and Grievance Policies and Procedures*.

## Outside employment/activities

In general, you are not prevented from accepting other employment outside your contract of employment with us. Any such additional employment should not, however, impact on your ability to fulfil your role and responsibilities with us. If you do wish to accept work from another employer (paid or unpaid), you must discuss this with your line manager beforehand and where necessary, complete the *Register of Interest*.

## Media and communications

Due to the public nature of the Programme we are delivering, you may be contacted by the media for information. The best thing to do is to take the details of the enquiry and pass these on to the External Affairs team. There will be occasions where we may want you to engage in media related activities and where this occurs, our External Affairs Director will support you so we can ensure consistent and accurate messages.

We ask that you don't disclose confidential information when using personal social media or engage in activities that could also damage our reputation. For further information, refer to the *Social Media Policy*.



## Storage of equipment

If you have been provided with equipment for example, laptop, mobile phone, etc., by the Programme, we ask that you ensure its safekeeping at all times.

All property and equipment must be securely stored overnight either in the facilities we provide onsite or within your own home. Any loss of property and equipment must be reported to the Data and Digital Team as soon as is practicably possible. We don't take responsibility for loss or damage to any personal property you may decide to bring into work with you.

## Breaches of our Code

Our Code of Conduct has been drawn up to provide guidance on conduct when you are acting on our behalf. Whilst we hope you will work with us in the way we expect, there may be times that doesn't happen. Where this is the case, we will review matters either through our formal processes or undertake contractual reviews. Where it is considered a serious or significant breach, this could result in your engagement with us ending or for our direct employees, be dealt with in accordance with our relevant policy and procedure.

**David Goldstone CBE**  
Chief Executive, Delivery Authority  
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