

<b>People Management Policy</b>
<b>Code of Conduct Policy</b>

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## **1) Purpose**

The aim of the London Legacy Development Corporation (LLDC) is to ensure that it achieves and maintains a high standard of work performance, conduct, attitude and behaviour.

The Code of Conduct is an integral part of setting the expected standards and supports the principle that our people should know what is expected of them in terms of standards of performance, conduct and behaviour, and the likely consequences of any failure to meet these standards.

We will provide guidance and where necessary give appropriate training to assist our people to meet standards. The aim is to establish a culture where our people work to the highest professional standards.

## **2) Scope**

This policy applies to all employees.

We also expect contractors, secondees and workers to observe the overarching principles set out in this policy.

Board members receive a separate Board members Code of Conduct which is attached to our Standing Orders.

This Code should be considered with the terms of our applicable policies and procedures, with the aim of ensuring that appropriate action can be taken without unnecessary delay, but in a legally compliant and fair framework.

Breaches of the Code of Conduct may be dealt with under the Disciplinary Policy and Procedure.

This Code should be read in conjunction with individual employment contracts and our other policies and guidance, including but not only: Disciplinary Policy, Grievance Policy, Capability Policy, Sickness Absence Policy, Whistleblowing Policy, Health and Safety Policy, Gifts and Hospitality Policy, Confidentiality Policy, Conflicts of Interest Policy, Data Protection Policy, Leave Policy, Flexible Working Policy, Hybrid Working Guidance, , Anti-Fraud, Bribery and Corruption Policy, and IT Acceptable Use Policy.

This policy does not form part of your contract of employment and we reserve the right to amend it at any time.

## **3) Roles and responsibilities**

### **Managers**

- to be clear and precise about our expectations of our people ensure that colleagues who directly report to them are aware of the expected standards of performance, conduct and behaviour.

### **Colleagues**

- should conduct themselves with integrity, impartiality and honesty. They
- should not deceive or knowingly mislead LLDC's Board, Management, or key stakeholders, including Government departments, Ministers, Parliament or the public.
- should familiarise yourself with the contents of the Code and must act in accordance with the principles set out in it

#### **4) Relationships with colleagues**

You are expected to maintain effective working relationships with colleagues and to present positive and co-operative attitudes.

You are expected to be courteous at all times. Inappropriate language, rudeness, disruptive behaviour and insubordination will not be tolerated and may result in disciplinary action being taken.

When close relationships develop between colleagues leading to marriage or civil partnerships or cohabitation this must be reported to the relevant manager as this may have a potentially distracting effect on members of a team and consideration must be given to re-assignment.

When the relationship is between parties where one has line management responsibility for the other, then action may be taken by requiring them to work in different departments (if practical).

#### **5) Accountability**

You should be aware of:

- Your accountability to our Board;
- that our Board is accountable to the Mayor of London and Greater London Authority who are ultimately accountable to the London Assembly and Parliament for our independence, effectiveness and efficiency.

#### **6) Standards of work**

You are required to fulfil the requirements of your role and maintain the standards of performance as outlined in your role profile. If employees are wilfully negligent in their duties, they may face disciplinary action.

The Capability Policy covers situations where standards of work fall below those required despite your best efforts and application.

#### **7) Punctuality**

You are required to make every effort to start work at the designated time and to work your contracted hours. Poor time keeping imposes extra burdens on your colleagues and our business. It is appreciated that unexpected domestic or transport difficulties can affect punctuality and if experienced should be reported immediately to your manager. Repeated failure of employees to be punctual may lead to disciplinary action.

#### **8) Absenteeism**

Unauthorised absence from work can be disruptive for your colleagues. You have a duty to report sickness and domestic emergencies leading to absence. For further information employees should refer to the Sickness Absence Policy and the Leave Policy.

#### **9) Working hours**

Your working hours may vary depending on the terms of the appointment and whether you are employed on a full-time or part-time basis. For employees who work full time, working hours are 37

hours per week, excluding 1 hour lunch breaks, worked across a five-day week. This works out to be Monday to Friday 9.00am to 5.30pm, Friday 9.00am to 5.00pm.

Our core hours are 10am to 4pm, with a minimum requirement of 40% of your working time being in the office. However, we reserve the right to vary this as necessary, according to business and operational needs. Further information can be found in the Hybrid Working Guidance.

All our people are expected to take a minimum of 30 minutes lunch break between the hours of 12.00 noon and 2.00 pm.

## **10) Conflicts of interest**

You should abide by the rules adopted by us in relation to private interests and possible conflict with public duty; the disclosure of official information; and political activities, as outlined in your contract of employment and our Conflicts of Interest Policy. You should review your personal circumstances regularly and take steps to deal with any potential conflict of interest. You are expected to conduct yourself with integrity, impartiality and honesty and your private interests should not be such as to have the potential for allegations of impropriety or partiality to be sustained thereby bringing LLDC into disrepute. You should ensure you complete a Declaration of Interests Form including any disclosable pecuniary interests and significant disclosable interests and update it with any changes or new interests within 28 days.

You should not misuse your official position or information acquired in their official duties to further your private interests or those of others. Key employees, such as the Chief Executive, all Executive Directors/Directors, managers of large contracts, and colleagues working on those contracts, should ensure that any possible conflict of interest is identified at an early stage.

## **11) Interests outside of work**

Employees are required to give their full time and commitment to LLDC and cannot hold other offices, employments, engagements and business interests without the prior notification to us and our approval. Any such other offices, employments, engagements and business interests should not detract from your ability to fulfil the full responsibilities of your role.

The agreement of the Executive Director with responsibility for your directorate should be sought before accepting any office, employment or engagement or before acquiring any business interest that would constitute a potential conflict of interest. Further details are set out in our Conflicts of Interest policy.

## **12) Conduct outside of work**

Your conduct outside of work must not bring the organisation into disrepute.

## **13) Political restriction**

You should be aware that there are certain restrictions set out in legislation regarding your ability to pursue outside activities and in particular involvement in political activities. We have deemed that all Band 7 and above posts are designated as politically restricted posts under the Local Government and

Housing Act 1989 and those posts fall into two categories, specified posts and politically sensitive posts. For full details please refer to the document on LLDC Politically Restricted Posts which also sets out the right to appeal for an exception.

#### **14) Fraud**

We view fraud very seriously. All instances will be investigated vigorously and promptly and appropriate action will be taken in line with our Anti-Fraud, Bribery and Corruption Policy. As stewards of public funds you must have, and be seen to have, high standards of honesty, propriety and personal integrity.

You are expected to act with propriety in the use of our resources and in the handling and use of public funds whether they are involved with cash or payment systems, receipts or dealing with contractors, suppliers or customers. You are also responsible for reporting immediately to your line manager or, if appropriate, to the Deputy Chief Executive, if you suspect or believe that there is evidence of irregular or improper behaviour or that a fraud has been committed. (See our Anti-Fraud, Bribery and Corruption Policy and Whistleblowing Policy).

#### **15) Integrity**

You should not use your official position to receive, agree to accept or attempt to obtain any payment or other consideration for doing, or not doing, anything or showing favour, or disfavour, to any person. You should not receive benefits of any kind from a third party which might reasonably be seen to compromise your personal judgement and integrity.

#### **16) Dress code**

You are expected to dress professionally and as appropriate for your working day, including wearing PPE for any visits to construction sites.

We recognise the diversity of cultures, religions and disabilities and will take a sensitive approach when this affects dress requirements. However, priority will be given to health and safety, and security considerations.

#### **17) Drugs and alcohol**

You should not knowingly take any non-medical substance, including alcohol or drugs that may affect your ability to work. If drugs are prescribed by a doctor or you take over the counter medication that may have an adverse effect on your work, you should inform your manager and the People and Organisational Development (POD) team in confidence.

The consumption of alcohol is not normally allowed on our premises or within work hours. Any exception to this rule will require the prior authorisation by the Chief Executive or their nominated delegate. You are responsible for ensuring that any alcohol which is consumed whilst off-duty does not affect your work in any way.

Smoking is not allowed on our premises.

You should note that the consumption or possession of, or being under influence of, illegal drugs or alcohol by employees within the workplace, during working hours, and/or whilst representing LLDC will be treated as gross misconduct.

**18) Personal use of social media by employees**

You must not assume that your comments on social media will remain private.

You must ensure that, in your use of social media, you do not make comments about other colleagues or LLDC that are or could be perceived as derogatory, abusive, damaging to your or our reputation or amount to harassment, even where such comments are made out of hours or outside the workplace. You should be mindful that such comments could give rise to legal action.

**19) Criminal offences**

If you are convicted of any criminal offence, or indicted for a serious criminal offence that could potentially result in a custodial sentence, whilst working for us, you must immediately inform your manager.

This information will be treated as strictly confidential. We reserve the right to consider your future employment status if the offence or alleged offence has a direct implication for your work or our reputation.

**20) Relations with the public**

If you deal with the affairs of the public, you should do so sympathetically, efficiently, promptly and without bias or maladministration. You should offer the public the highest standards of conduct and service.

**21) Gifts and hospitality**

We recognise that our good standing and credibility is essential to our success and that this is best served by promoting open and transparent practices that develop and maintain trust and confidence with our partners, stakeholders and others.

It is imperative that your acceptance of gifts and hospitality can stand up to public scrutiny. You should not receive benefits of any kind from a third party which might reasonably be seen to compromise your personal judgement or integrity.

You must take personal responsibility to ensure that appropriate records are placed in the hospitality register. Please refer to the Gifts and Hospitality policy for full guidance.

**22) Use of property and resources**

You must take reasonable care of our property and equipment. Property may not be removed from the premises or destroyed without express written permission. Unauthorised removal of such items may be regarded as theft.

You have a duty to protect and respect all equipment provided by us for your individual use (e.g. mobile devices, laptop/tablets) which must be returned on leaving employment or when otherwise required.

Negligent or wilful damage by employees to our, or other colleagues' property or equipment may lead to disciplinary action.

We are not responsible for any loss of your cash, valuables or personal possessions. You are advised not to bring large amounts of cash or other valuables on to our premises.

### **23) Use of email, internet and telephones**

We may monitor and record use of telecommunications systems (including internet sites visited, telephone calls and emails made, sent or received), during the course of your employment for the purposes permitted by law.

These purposes include:

- establishing facts,
- ascertaining compliance with regulations and codes of practice,
- ascertaining standards which are or should be achieved by users of our telecommunications systems,
- preventing or detecting crime.

Use of the internet by employees is permitted and encouraged where such use supports our goals and objectives. However, we have a policy for the use of the Internet whereby you must ensure that you:

- comply with current legislation;
- use the Internet in an acceptable way; and
- do not create unnecessary business risk to the organisation by their misuse of the Internet.

The following is deemed unacceptable use or behaviour and may result in disciplinary action being taken:

- visiting Internet sites that contain obscene, hateful, pornographic or illegal material;
- using the computer to perpetrate any form of fraud, or software, film or music piracy;
- using the Internet to send offensive or harassing material to other users;
- downloading commercial software or any copyrighted materials belonging to third parties, unless this download is covered or permitted under a commercial agreement or other such licence;
- introducing any form of malicious software into the corporate network.

You are allowed to make use of our internet facilities during break times for your own personal use, although it is expected this is kept to a minimum and used in accordance with the IT Acceptable Use Policy.

### **24) Confidentiality**

We are committed to the effective and responsible management of information held and acquired during our transactions and operations. We acknowledge that there are legitimate reasons for some information to be regarded as confidential and we require our people to preserve and protect access to and use of confidential and/or sensitive information held or acquired.

We require our people to commit to and fulfil their duty to observe the confidentiality of, access to and use of confidential and/or sensitive information that they acquire whilst working at LLDC.

You must not, during or after working at LLDC, except as authorised or required by your duties, reveal any of the trade secrets, secret or confidential operations, processes or dealings or any information to any person, organisation, the press or media.



You must not make or publish any derogatory or disparaging statement about LLDC or our people which is intended to or which might be expected to damage or lower reputations.

Nothing in this clause shall prevent or limit your rights in respect of the legislation on public interest disclosure (whistleblowing) or your right to seek legal advice or advice from your union.

## **25) Public statements**

Other than members of the Executive Management Team, you must not make or participate in any public statements (including making any comment or statement or giving any interview to the press or other media) without the prior approval of the Director of Communication, Marketing and Strategy or their designated deputy.

If you are given prior approval to make a public statement you must comply with any reasonable requirements from time to time relating to the making of public statements including press, radio and television statements or interviews.

## **26) Publications and lectures**

You may not, without the permission of the Director of Communication, Marketing and Strategy or their designated deputy (which shall not be unreasonably withheld), publish any matter or deliver any lecture or address about LLDC or our business.

## **27) Copyright**

You should promptly disclose, all works in which copyright or design rights may exist which you make or originate either by yourself or jointly with other people whilst working at LLDC

Any copyright works or designs you create in the normal course of working at LLDC or in the course of carrying out duties specifically assigned to you, which relate to our affairs, shall be our property whether or not the work was at our direction, or it was intended for us and the copyrights in it and the rights in any design shall belong to us.

## **28) Data protection obligations**

You should be aware of your obligations under the Data Protection Act (1998), including General Data Protection Regulations and Freedom of Information Act (2000).

All personal data must be treated confidentially and managed securely. There must be a clear purpose for the collection and use of personal data. Personal data must not be shared unless there is a clear consent from the data subject to do so, or a legitimate business interest. For example, bank details of colleagues are shared with the payroll system so they can be paid.

You must be familiar with, and follow, information security procedures including password policies and secure transfer of data.

All personal data which is no longer needed must be securely disposed of. This includes paper files.

You must be aware of the need to ensure confidentiality of personal data at all times.

**29) Whistleblowing**

We are committed to encouraging a climate and culture of openness in all areas of operation, as set out in our Whistleblowing Policy.

You should raise any concerns through your line manager or approach in confidence the Deputy Chief Executive if you have concerns about illegal, improper or unethical behaviour, or if you believe that they are being required to act in a way which:

- is illegal, improper, or unethical;
- is in breach of a professional code;
- may involve possible maladministration, fraud or misuse of public funds; or
- is otherwise inconsistent with this Code (See Whistleblowing Policy).

**30) Diversity, Equity and inclusion**

We aim to promote equity, tackle discrimination and encourage a culture where diversity is valued, talent is nurtured, and individuals are treated with dignity and respect.

Our people are required to assist us to meet our commitment to provide equal opportunities in employment and avoid unlawful discrimination.

Acts of discrimination, harassment, bullying or victimisation against colleagues or customers are disciplinary offences and will be dealt with under our disciplinary procedure. Discrimination, harassment, bullying or victimisation by employees may constitute gross misconduct and could lead to dismissal without notice.

**31) Health and Safety**

You have a statutory duty to apply the instructions of managers and any requirements established to ensure the health and safety of employees, other individuals providing services to LLDC, the public and yourself while on our premises. If you become aware of a hazard or dangerous occurrence you are expected to notify your manager.

You must use equipment provided for health or safety purposes.

Please refer to the Health & Safety Policy for more details.

**32) Bullying and harassment**

We are committed to promoting equity, diversity and an inclusive and supportive working environment to ensure the rights of our people to be treated fairly and with respect, protecting colleagues, and any other persons for whom they have a responsibility, from any form of bullying or harassment, which might inhibit them from pursuing their work.

You are responsible for treating your colleagues with dignity. For the success of the Code of Conduct Policy, you should ensure that you take the time to read and understand the Dignity at Work Policy. You should disclose any instances of harassment or bullying of which you become aware to your line manager or another appropriate manager within your line management chain.

Complaints of bullying or harassment will be taken seriously and would be dealt with under our Grievance Policy and may lead to disciplinary action against employees found to have breached the policy. You have a personal responsibility to ensure that your behaviour is not contrary to our Dignity at Work Policy.

### **33) After leaving employment**

Employees should continue to observe their duty of confidentiality after they have left our employment and should be aware of and abide by any rules on the acceptance of business appointments after resignation or retirement.

You should ensure you update your social media accounts (Linked In, Twitter etc) to remove LLDC as your place of employment.

### **34) Business ethics**

Our guiding principles on ethics and the management of ethical issues are based on open and explicit relationships. We are committed to:

- operating with honesty and integrity in all areas of our work;
- respecting cultural differences and valuing diversity;
- dealing courteously with those who hold opinions that differ from ours;
- treating people respectfully and fairly, including colleagues, stakeholders, customers and suppliers.

**35) Glossary**

**LLDC/Our/Us/We** - refers to London Legacy Development Corporation

**People or Colleagues** – people who work at LLDC such as contractors, workers, secondees

**You or Employee** – people who work for an employer under a contract of employment and are entitled to statutory rights relevant to that employment

**36) Document Control**

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<b>Organisation</b>	London Legacy Development Corporation
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V2	1/4/2017	Amended to reflect changes House Style and ensure the policy is clear and user-friendly. Full staff consultation was undertaken.	HR Department
V3	25/5/2018	Data Protection amended in line with GDPR	Senior Information Manager
V4	December 2022	People and Organisational Development Team	Amended to reflect process changes, in line with best practice

**Approvals**

Job title	Name	Signature	Date
Legal			<b>May 2023</b>
EMT			<b>August 2023</b>