



OFFICE OF THE POLICE & CRIME COMMISSIONER
Staff Code of Conduct

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1. Introduction

- 1.1 The Office of the Police and Crime Commissioner (OPCC) is publicly accountable and frequently works in partnership with other organisations, both in the public and private sector. It is therefore vital that all staff and representatives of the Police and Crime Commissioner (PCC) conduct themselves in an exemplary manner in all aspects of their work and show no bias whatever their personal or political views might be.
- 1.2 The purpose and aim of the Code of Conduct is to provide guidance regarding the standards of conduct and behaviour that is expected from staff in the Office of the Police and Crime Commissioner (OPCC) working under the direction and control of the Chief of Staff of the Local Policing Body. This Code of Conduct does not apply to staff employed by or under the direction and control of the Chief Constable.
- 1.3 The public is entitled to demand that an employee of the Police and Crime Commissioner (PCC) conducts himself/herself to the highest standards. Public confidence would be damaged if appropriate standards are not maintained.
- 1.4 This Code forms part of the terms and conditions of employment of employees. A breach of this Code shall be dealt with in accordance with the disciplinary Procedure applying to employees of the Police and Crime Commissioner.
- 1.5 The following sections provide details and some examples of the type of conduct expected. If an employee requires further guidance on any issue relating to conduct, then they should consult with a senior manager. Please note that this code of conduct is not exhaustive.
- 1.6 The Police Staff Standards of Professional Behaviour sets out the expectations that the police service and the public have of how police staff should behave. The PCC's staff are expected to abide by the Police Staff Standards of Professional Behaviour insofar as they are relevant.
- 1.7 A copy of the Police Staff Standards of Professional Behaviour can be found here [Police Staff Standards of Professional Behaviour | Local Government Association](#)
- 1.8 A separate Code of Conduct is in place for the Police and Crime Commissioner and Deputy Police & Crime Commissioner. [Ethical Framework Policy | OPCC for Avon and Somerset \(avonandsomerset-pcc.gov.uk\)](#)

2 Responsibilities

- 2.1 It is of the utmost importance that the Police and Crime Commissioner maintains public confidence in the integrity of themselves and their staff. Staff should, at all times, act in the public interest. Staff have a responsibility to act fairly, objectively and in good faith. Staff should be familiar with the Police and Crime plan, its aims and objectives; relevant laws and regulations; and the internal management, policies and procedures that relate to staff work.
- 2.2 It is expected that the OPCC as a public authority supports the Principles of Standards in Public Life. As such, the seven principles of conduct underpin the work of the OPCC and are used as the basis for working practices.

The Principles of Standards in Public Life are:

Selflessness: Holders of public office should take decisions solely in terms of the public interest. They should not do so to gain financial or other material benefits for themselves, their family or their friends.

Integrity: Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

Objectivity: In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability: Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness: Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty: Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership: Holders of public office should promote and support these principles by leadership and example.

Staff are required to abide by the cultural and behavioural values which underpin the OPCC work:

- 2.3 **Our purpose:** To lead improvement in efficiency and effectiveness of policing, victim support and criminal justice services on behalf of local people.
- 2.4 **Our vision:** Excellent victim support, better policing and fairer criminal justice services for all.
- 2.3 **Our mission:**
- We listen
 - We lead
 - We challenge
 - We innovate
 - We improve
- 2.4 **Our values:**

Openness – We will always be transparent and open about the work we do, our services and how we support our communities.

Partnership – We will work with the police and key partners to provide better services to local people.

Compassion - We will continue to take a compassionate approach to commission the most effective support services for victims and survivors.

Courage – We are the voice of local people in policing, and we will always share concerns, issues and feedback to the police and partners.

2.5 In addition, staff should comply with any other requirements of the Elected Local Policing Body, including standing orders and financial regulations.

2.6 The following principles provide guidance on the standards of conduct reasonably expected of staff in the Office of the Police and Crime Commissioner:

- Act always in such a manner as to promote and safeguard the interests and well-being of colleagues and the general public.
- Ensure that no action or omission on the part of staff or within the sphere of staff work is detrimental to the interests, conditions or safety of the Police and Crime Commissioner and Office.
- To be responsible for upholding the law and to act on all occasions in accordance with the trust placed in staff of the Police and Crime Commissioner.
- Adopt a proactive, responsible, and cooperative attitude towards Health & Safety
- Take action if staff witness or are made aware of any improper conduct, including any act of harassment or victimisation.
- Not to discriminate on the grounds of a protected characteristic (age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation) unlawfully, for example, in decisions made for recruitment.
- Ensure that staff behaviour does not cause embarrassment or reflect negatively on the Local Policing Body in a way that would bring the reputation of the Local Policing Body into disrepute or cause a loss of public confidence in its work.
- Staff must not do anything which may cause the Local Policing Body to breach any of the equality duties as defined in the Equality Act 2010
- Staff must not act in any way that would bring the PCC or the OPCC into disrepute.

3 Duties

- 3.1 **Use of Alcohol or illegal drugs:** Unsatisfactory performance, attendance or behaviour caused by excess alcohol consumption or by drugs may be dealt with under the Local Policing Body's disciplinary procedures, depending on circumstances. If a member of staff is prescribed drugs which may affect their ability to do their job, then they should seek advice from their line manager on the health and safety implications of this as soon as possible.
- 3.2 **Accountability:** Staff should conduct themselves with integrity, impartiality and honesty. Staff should not deceive or knowingly mislead the Local Policing Body, the police or the public. Staff should offer the public the highest standards of conduct and service.
- 3.3 **Conflicts of interest:** Staff should abide by the rules regarding private interest and possible and potential conflict with public duty; the acceptance of gifts and hospitality; disclosure of commercial, personal and confidential information and political activities. Staff should not misuse their official position or information acquired in their official duties to further their private interests or those of others.

As part of the role of the OPCC is to hold the Chief Constable and Office of the Chief Constable to account, the staff need to have due consideration of the appropriateness of their relationships with members of the OCC who are in positions of influence and authority. If you believe that this applies to you, please discuss this with a member of the SLT about how this can be managed.

Staff should ensure that any possible conflicts of interest are identified to the Chief of Staff at an early stage and that appropriate action is taken to resolve them.

- 3.4 **Integrity:** Staff should not use their 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. Staff should not receive benefits of any kind from any third party that might reasonably be seen to compromise their personal judgement and integrity.

Under the Prevention of Corruption Act 1916 employees of public bodies may be required to prove that the receipt of payment or other consideration from someone seeking to obtain a contract is not corrupt.

Staff must not do anything which may cause the Local Policing Body to breach any of the enactments within the Bribery Act 2010, which covers a wide range of direct and indirect bribery offences. Penalties for non-compliance are serious (imprisonment/fines up to £5,000) and offences include:

- Giving a bribe – offering, promising or giving of an advantage
- Receiving a bribe – requesting, agreeing to receive or accepting an advantage

Please refer to the OPCC Gifts and Hospitality policy: [Gifts and Hospitality Policy | OPCC for Avon and Somerset](#)

- 3.5 **Relations with the public:** Staff in the Office of the Police and Crime Commissioner who deal with the affairs of the public should do so sympathetically, efficiently, promptly and without bias or maladministration.
- 3.6 **Confidentiality/Use of Information:** Staff owe a general duty of confidentiality to their employer under common law. During the course of employment staff will come across confidential information. The privacy and confidentiality of such information must be maintained at all times unless staff are expressly authorised to divulge it or are required to do so by law or for safeguarding purposes.

Employees should not disclose the proceedings of any Local Policing Body meeting from which the press or public have been excluded unless staff are required to do so by law or have been authorised to do so. Care should be taken to ensure that any information that is disclosed is accurate.

Business information should not be divulged to any third party or used other than for the purpose of discharging the functions of the Local Policing Body.

Contracts, commissioning or purchasing arrangements must not be used for personal benefit or to benefit any person or organisation other than the Local Policing Body unless approval is obtained.

If staff have any reservations about any request to supply information, they should immediately refer the matter to their line manager or SLT member.

Nothing in this Code of Conduct shall prohibit you from making a protected disclosure under the Employment Rights Act 1996, making a disclosure to a regulator, ombudsman or supervisory authority regarding any misconduct, wrongdoing or serious breach of regulatory requirements, making a disclosure in confidence to a legal, tax or medical professional who is bound by a professional obligation of confidence, reporting a criminal offence to the police or any law enforcement agency or co-operating with a criminal investigation or prosecution. Further information is set out in the Whistleblowing policy.

- 3.7 **Use of Resources:** Staff should try, at all times, to ensure proper, economic, effective and efficient use of resources as befits public money and always give value for money.

Local Policing Body resources, whether tangible assets such as materials, equipment and cash, or business information such as trade secrets, or business time, may not be used other than for the proper advancement of the business of the Local Policing Body.

- 3.8 **Computer security, mobile devices and data protection:** The information stored and processed on the Local Policing Body's (the PCC's) and Avon and Somerset Constabulary's Information Technology systems is of paramount importance to day-to-day activities. It is therefore essential that the data and systems are adequately secured against risks such as operator errors, theft of equipment, unauthorised access to or copying of programmes, use of unauthorised software on Local Policing Body computers (which increases the risk of importing computer viruses) and natural hazards such as fire, flood and power failures.

The Data Protection Act 2018 (which requires all users of personal data to be registered with the Information Commission and to comply with the Data protection Principles), the General Data Protection Regulation and the Computer Misuse Act 1990 (which seeks to secure computer material against access or modification), must be complied with.

Staff must ensure that no unauthorised person gains access to equipment or data that they are responsible for. Login passwords must not be used for other logins and must not be disclosed to anyone.

Any data breach must be reported to the Data Protection Officer as soon as possible and within 72 hours.

Further information is contained in our Data Protection Policy and IT, Communications, Internet & Social Media policy.

- 3.9 **Grants, procurement and partnership arrangements:** If the PCC provides support to the community or an organisation there should be no conflict of interest involved. For instance, staff and representatives must never try to influence a commissioning/grant/procurement decision in favour of a specific venture that they,

their partner or any other relative or close friend are involved in, no matter how worthy the cause.

Many of the Commissioner's objectives are delivered by developing partnership arrangements with one or more organisations. These organisations may be other public sector organisations, private sector companies, voluntary organisations or community groups. It is important that if staff or representatives participate in such a group, they are clear as to the authority invested in them by the Commissioner and the other partner organisations.

Staff and representatives should always check with their line manager as to the extent of their participation and as usual show no bias and ensure that all decisions are based on achieving best value for the Commissioner.

- 3.10 **Copyright:** All records, documents and other papers relating to the finance and administration of the Local Policing Body and which are compiled or acquired by staff in the course of staff employment are and will remain the property of the Local Policing Body, and the copyright in all such cases belongs exclusively to the Local Policing Body.

In the case of scholar work - such as projects undertaken as part of a course to further a professional career, and including books, contributions to books, articles and conference papers - the copyright will belong to the employee.

- 3.11 **Conduct away from work:** The life of staff away from work is their own personal concern. However, staff should not conduct themselves in a manner which, because of the nature of their employment, would undermine the Local Policing Body's confidence, trust or otherwise bring the Local Policing Body into disrepute.

In particular, staff should not conduct themselves in a manner which could result in criminal charges being brought against them. The Local Policing Body takes the view that, because of its responsibilities in relation to policing, there is an even greater onus on its employees not to commit offences than might apply in other forms of employment. The Local Policing Body therefore requires staff to notify the Chief of Staff without delay of any charges which have been brought or may be brought against them whether or not they are directly relevant to their employment.

- 3.12 **Equality and Diversity:** A public authority, which includes the Local Policing Body, must, in the exercise of its functions, have due regard to the need to eliminate unlawful discrimination, victimisation and harassment on the grounds of: race, disability, religion or belief, age, sex, sexual orientation, gender reassignment, and pregnancy and maternity. The Local Policing Body is committed to advancing equality of opportunity and fostering good relations for all in its employment. Discrimination by staff will not be tolerated. Further information is contained in our Equal Opportunities policy. You must treat others with respect always.

- 3.13 **Staff concerns about improper conduct:** If an employee of the Local Policing Body believes 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 of conduct

then they should either raise the matter with a member of the Senior Leadership Team.

Staff should also draw attention to cases where there is evidence of criminal or unlawful activity by others.

Staff may also report cases where they believe there is evidence of irregular or improper behaviour elsewhere in the organisation, but where they have not been personally involved; or if they are required to act in a way which, for them, raises a fundamental issue of conscience. Such issues may be raised with a member of

the Senior Leadership Team; if they relate to the Chief of Staff, they should be raised with the Police and Crime Commissioner.

Please refer to the Whistleblowing policy [Whistleblowing Policy | OPCC for Avon and Somerset \(avonandsomerset-pcc.gov.uk\)](https://www.avonandsomerset-pcc.gov.uk/whistleblowing-policy)

- 3.14 **Additional employment:** For all staff employed by the OPCC, in accordance with the terms of employment, permission must be sought from the Chief of Staff to engage in any other business or take up any additional appointment. Such permission will not be unreasonably withheld. Complete this form and submit to the OPCC HR team [Additional employment/volunteering form](#).

Staff must not be involved in any outside activity or work that could cause a conflict of interest with their responsibilities to the OPCC, or which makes use of knowledge or information which the staff member has access to because of their position. Similarly, where a member of staff wishes to partake in any voluntary activity or role in a voluntary organisation, care should be taken to clarify the expectations of the role and whether there is any conflict of interest.

If there is any uncertainty, any such activity should not be engaged in before first seeking the express permission of the Chief of Staff.

Liability can arise from formal membership of external organisations and permission should be sought if there is reason to believe that any liability may arise.

Where payment is received by staff for work which arises principally as a result of work-related skills, the employee must ensure that assets or information belonging to the Local Policing Body are not used when undertaking such work, unless prior permission has been sought and granted by the Chief of Staff. Staff must also ensure that any persons that they deal with understand that they are acting in a private capacity, and not on behalf of the Local Policing Body.

Staff undertaking secondary employment must ensure that any income received is properly declared to the relevant authorities.

- 3.15 **Political restrictions:** All paid staff in the Office of the Police and Crime Commissioner, with the exception of the DPCC, will be politically restricted. Staff are not eligible to stand for office as a Member of Parliament but may participate in County, Borough or Parish council activities, provided any resultant conflict of interest is declared. Staff should not be involved in advertising any political group. Please refer to the Guidance on Politically restricted posts.

- 3.16 **Vetting:** All staff and representatives will be vetted by Avon and Somerset Police. The level of vetting required will be decided when a position is advertised. Re-vetting will ordinarily take place every three years.

If a circumstance arises which could impact upon the current vetting confirmation, this must be notified to the Chief of Staff and the Vetting Office immediately. Further vetting may be required.

If staff or representatives are involved in any civil or legal proceedings these should be reported to the Chief of Staff as soon as the situation occurs.

- 3.17 **Complaints:** Any complaint that an employee may have breached this Code of Conduct shall be made to the Chief of Staff. Should the concern involve the Chief of Staff, the matter should be reported to the PCC marked as private and confidential.

- 3.18 **After leaving employment:** Staff should continue to observe their duty of confidentiality after leaving the employment of the Local Policing Body.

Process for Review

This policy will be reviewed every 2 years to ensure it is up to date with good practice and relevant guidance and legislation.

Policy Statement Information	
Policy Owner (Job Title)	Chief of Staff
Date to be Reviewed	October 2025
Date Last Review Completed	November 2023
Effective Commencement Date	July 2014