

STAFF CODE OF CONDUCT

REVISION	REVIEW DATE	OWNER	REFERENCE	COMMENT
00	14/10/2011	HR MANAGER	HR-POL-010	FORMAT REVISED / BRIBERY ACT
01	JANUARY 2014	HR MANAGER	HR-POL-010	FORMAT CHANGE
	MARCH 2017	HR	HR-POL-010	NO CHANGE

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1. Introduction

This document sets out a Code of Conduct for all staff and consultants employed by, and volunteer and placement students in the service of, the Board of Trustees of the Royal Armouries (hereafter the Board) at any of the Royal Armouries' (hereafter the Museum) sites. It has immediate effect and remains in force until such time as altered or replaced by the Board having taken reasonable regard to the views of its staff, its sponsoring department and any other interested parties.

2. Duties and Responsibilities

Staff should familiarise themselves with the contents of the Code and should act in accordance with the principles set out in it.

Staff have a duty:

- to discharge public functions reasonably and according to the law; and
- to recognise and abide by the ethical standards governing their particular profession (see below)

The Director General & Master, who is designated as Accounting Officer, has overall responsibility working under the Board for propriety in a broad sense, including conduct and discipline.

3. Accountability

Staff should be aware:

- of their accountability to the Board of Trustees of the Armouries which they serve;
- of the respective roles of the sponsor department, the Department for Culture, Media and Sport (hereafter the Department), and the Board.
- that the Minister responsible for the Board is ultimately accountable to Parliament for its independence, effectiveness and efficiency.
- that the Board acknowledges its responsibilities under law as an employer. These responsibilities are set out in their own Code of Conduct.

Staff should conduct themselves with integrity, impartiality and honesty. They should not deceive or knowingly mislead the Board, the Department, Ministers, Parliament or the public.

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4. Conflicts of interest

Staff should abide by any rules adopted and communicated to them by the Board, including their own professional codes of ethics, in relation to private interest and possible conflict with public duty; the disclosure of official information; and political activities. In general terms they should:

- at all times seek to avoid a conflict between private interest and public duty, and should seek advice, initially from their line manager, if such a conflict seems likely to occur;
- make full and accurate information available about the collections and subjects of the museum to whomsoever, but seek advice from the Director General & Master on how to respond to requests for information about the policies or intentions of the Board (see 9 below)
- avoid, as far as possible, any personal activities which might be construed as conflicting with the interests of the Museum or the Board, or the public interest,

Guidance: *staff should make their role clear, both to their line managers and to their prospective audience, in any activity where it is possible that a conflict of interest could be construed (e.g. if a curator is paid for advice or writing by a third party). Moreover, they should ensure that they are not seen as representing the Museum or Board if they are speaking as a member of an outside organisation (e.g. a pressure group or political party). Staff are entitled to take part in the legitimate activities of a recognised Trade Union within the bounds of current legislation.*

- in addition, they should not misuse their official position, or information acquired in their official duties, to further their private interests or those of others.
- all staff, particularly the Finance & Administration Director, any managers or procurers of large contracts, and staff working on contracts, should ensure that any possible conflicts of interest are identified at an early stage to the Director General & Master and that appropriate action is taken to resolve them. Specifically they must declare any instance where they, or their close relative or associate, has a controlling and/or significant interest in any business, activity or pursuit which might compete for a contract for the supply of goods or services to the Armouries. The Director General & Master should report any personal conflict of interest to the Board.

Guidance: *for their own protection staff are required to complete and update as necessary a Declaration of Interest form, which is retained by HR.*

- staff must not seek, or accept, preferential rates or benefits in kind for private transactions carried with companies with which they have had, or may have, official dealing on behalf of the Armouries.

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5. Integrity

The museum is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee and individual acting on the museum's behalf is responsible for maintaining its reputation and for conducting business honestly and professionally.

Transparent, fair conduct helps to foster deeper relationships of trust between the organisation and its business partners and customers. It is vital for the museum's reputation and future growth.

The museum does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons or companies acting for it or on its behalf. The Board and senior management are committed to implementing and enforcing effective systems throughout the organisation to prevent, identify and eliminate bribery, in accordance with the Bribery Act 2010.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees and others acting for or on behalf of the museum are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

A breach of this policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for the museum should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation.

The success of the museum's anti-bribery measures depends on all employees, and those acting for the organisation, playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, the museum are encouraged to report any suspected bribery in accordance with the procedures set out in the Whistle Blowing policy.

6. Relations with the public

Whenever they deal with the affairs of the public, staff should, as far as possible, do so sympathetically, efficiently, promptly and without bias or maladministration. Staff should always offer the public the highest possible standards of conduct and service.

Guidance: *staff should seek advice from their line managers on priorities where Museum needs conflict with the provision of a speedy and effective response to public enquiries.*

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7. Use of Resources

Staff should endeavour to ensure the proper, economical, effective and efficient use of resources.

8. Official Information

The Museum supports the Government's policy on access to official information, Freedom of Information and Transparency Agenda. Nothing in the Code should be taken as overriding existing statutory or common law obligations to keep confidential, or in appropriate cases to disclose, certain information.

Guidance: *there are many different types of information held by the Board and many require confidentiality for various reasons. Here are four instances:*

- *Argument and discussion of the Board. Decisions of the Board will normally be public knowledge, but the arguments behind the decisions and the identity of the individual making these arguments often need to be protected.*
- *Government policy. The Board is sometimes consulted about such things as legislation change. These proposals understandably remain confidential until laid before parliament.*
- *Partner's information. We now work with a private sector partner and are privy to information which is "commercial in confidence" and should not be released.*
- *Personal information. Through our databases we hold information which it may be illegal to divulge. In our inventory files we have information on the identity of previous owners that they may not wish to be released.*

9. Staff concerns about improper conduct

If staff believe 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;

they should raise the matter as set out in the museum's Whistle Blowing Policy, Staff should follow the Whistle Blowing Policy if suspicion or evidence of criminal or unlawful activity by others and 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 or which contravenes a code of ethics of a professional body to which they are bound.

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Where a member of staff has reported a matter covered in paragraph 10 above and believes that the Director General & Master's response does not represent a reasonable response to the grounds of his or her concern, or when the matter concerns the actions of the Director General & Master, he or she should report this concern directly to the Chairman of the Board of Trustees, or a Trustee nominated for the purpose. It will be the direct and personal responsibility of the Board to investigate and take whatever action it sees fit, and, where necessary, inform the Department who may itself wish to investigate the matter.

Management acknowledge that no system is infallible and that there may be particular situations in which it is unreasonable to follow the above procedure outlined in paragraph 11. In such circumstances individuals should report the matter to the Department directly by writing to the Head of the sponsor division.

10 After leaving employment

Staff should continue to observe the duty of confidentiality (see paragraph 9 above) after they have left the employment of the Board. Staff should also be aware of and abide by the rules on the acceptance of business appointments after resignation or retirement.

11 Professional Codes of Conduct

With reference to paragraph 5 above the Board accepts and expects its staff to abide by an appropriate Code of Conduct of the Museums Association to be appended to this code when agreed.

The undersigned register their agreement to this CODE OF CONDUCT FOR STAFF and to its implementation as from 1st August 2011.

This document was produced in consultation with Prospect.

Signed Name Date

Director General & Master

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I have received a copy of the Royal Armouries Code of Conduct for Staff

Signed: Date:

Name:

Please sign this sheet and return it to the HR Department.

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