



CODE OF CONDUCT FOR CCWATER STAFF

BACKGROUND

1. The Consumer Council for Water (CCWater) is a non-departmental public body established on 1 October 2005 under the Water Act 2003 to represent consumers of water and sewerage services in England and Wales. It is a national body with an English regional and Welsh organisational structure to reflect the significant geographic variations in water and sewerage provision and to keep in touch with consumers in their local communities. The headquarters of the organisation are in Birmingham and it has four regional committees in England and one in Wales.

PUBLIC SERVICE VALUES

2. Staff at CCWater should
 - follow the Seven Principles of Public Life set out by the Committee on Standards in Public Life,
 - observe the highest standards of propriety involving **impartiality, integrity and objectivity** in relation to the stewardship of public funds and the management of CCWater;
 - maximise **value for money** through ensuring that services are delivered in the most cost-effective, efficient and economical way, within available resources, and with independent validation of performance achieved wherever practicable;
 - be **accountable** to Parliament and the Welsh national Assembly, users of services, individual citizens and staff for the activities of CCWater, their stewardship of public funds and the extent to which key performance targets and objectives have been met;
 - work in accordance with Government policy on **openness**, and comply fully with section 27J of the Water Industry Act 1991 (relating to the provision of information by CCWater), the Freedom of Information Act 2000, Data Protection Act 1998 and the Environmental Information Regulations 2005 (which gives the public the right to obtain environmental information from public bodies).

DUTIES AND RESPONSIBILITIES

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

4. Staff have a duty:

- to discharge public functions reasonably and according to the law; and
- to recognise ethical standards governing particular professions.

CCWater's CEO is designated as the accounting officer, and has overall responsibility for propriety in a broad sense, including conduct and discipline.

Staff should familiarise themselves with the following policies which are part of their employment contract.

- Equality
- Disciplinary
- Grievance and Whistleblowing
- Data protection
- Freedom of Information

ACCOUNTABILITY

5. CCWater staff should be aware:

- of their accountability to the Board of CCWater;
- of the respective roles of the sponsor department and the public body as set out in a Management Statement, Framework Document or agreed Memorandum of Understanding;
- that the Minister responsible for the body is ultimately accountable to Parliament for its independence, effectiveness and efficiency.

The Board has responsibilities as an employer. These are set out in their own Code of Practice.

6. CCWater Staff should conduct themselves with integrity, impartiality and honesty. They should not deceive or knowingly mislead the board, the sponsor department, Ministers, Parliament or the public.

CONFLICTS OF INTEREST

7. Staff should abide by the rules adopted by CCWater in relation to private interest and possible conflict with public duty; the disclosure of official information; and political activities. They should not misuse their official position or information acquired in their official duties to further their private interests or those of others. Key members of staff, such as the Chief Executive, Senior managers, managers of large contracts, and staff working on contracts, should ensure that any possible conflicts of interest are identified at an early stage and that appropriate action is taken to resolve them.

INTEGRITY

8. 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. They should not receive benefits of any kind from a third party which 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 of other consideration from someone seeking to obtain a contract is not corrupt.

RELATIONS WITH THE PUBLIC

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

USE OF RESOURCES

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

CONFIDENTIALITY

11. Staff owe a general duty of confidentiality to their employer under civil law. They are therefore required to protect official information held in confidence. The Official Secrets Act 1989 applies to any member of the public who has, or has had, official information in their possession. The Act makes unlawful disclosure of certain limited categories of information (for example security and intelligence, defence, international relations, and information which may lead to the commission of crime) a criminal offence. The Act applies explicitly to those staff of Non Departmental Public Bodies who are Crown servants, and to the staff of a small number of NDPBs listed in the Act.

DATA PROTECTION

12. Staff should be aware of their obligations under the Data Protection Act (1998) and Freedom of Information Act (2000). Guidance on this legislation can be obtained from the Information Commissioner (www.informationcommissioner.gov.uk).

MEDIA

13. Staff are not to have any direct contact with the media at any level on CCWater matters without the knowledge of the Public Relations Department and shall act in accordance with the advice given by the Public Relations

Department. Should the media contact an individual member on a CCWater matter, the Public relations Department shall be immediately notified.

STAFF CONCERNS ABOUT IMPROPER CONDUCT

14. 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 through the management line and if it is not resolved satisfactorily use the whistle blowing policy to raise their concerns about illegal, improper or unethical behaviour. Staff should also draw attention to cases where:

- they believe there is evidence of irregular or improper behaviour elsewhere in the organisation, but where they have not been personally involved;
 - there is evidence of criminal or unlawful activity by others;
 - They are required to act in a way which, for them, raises a fundamental issue of conscience.
15. Where a member of staff has reported a matter covered in paragraph 11 above and believes that the response does not represent a reasonable response to the grounds of his or her concern, he or she may report the matter in writing to a nominated official in the sponsor department who will investigate the matter further.
16. Staff should be aware of the provisions of the Public Interest Disclosure Act 1998, which protects individuals who make certain disclosures of information in the public interest.

AFTER LEAVING EMPLOYMENT

17. Staff should continue to observe their duty of confidentiality (see paragraph 11 above) after they have left the employment of CCWater and should be aware of and abide by any rules on the acceptance of business appointments after resignation or retirement. Chapter four of the Civil Service Management Code deals with this issue and should be consulted to see parallel arrangements in the Civil Service.