

## Code of conduct

Employees throughout BW have a history of giving a high quality level of service and a high standard of integrity. This has been a key aspect in its successful development.

Each individual is responsible for regulating his or her own conduct in all aspects of their work and seeking advice where apparent conflicts arise.

To assist in the maintenance of such standards, BW has adopted seven principles which should be followed by employees in their day to day duties. They affect the way we deal with each other, with customers and with our suppliers. In addition to demonstrating that our actions are in the public interest, adherence to the code of conduct will protect employees from being unnecessarily and unfairly accused of impropriety.

The seven principles are:

### **Selflessness**

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

### **Self interest**

- Employees should not participate in, or otherwise influence, in any way the administrative processes leading up to the award of a contract or other matter in which the employee has a direct or indirect pecuniary or non pecuniary interest.
- any such pecuniary interest, such as debt or significant investment, in an external organisation should be declared in writing to the local waterway or departmental manager.
- Employees should also declare in the same manner any non pecuniary interest which could also be construed as influencing the way in which they carry out their duties.

Indirect interests are where the employee :

- is a partner in, retained or employed by another organisation
- has a wife, partner, friend or close relation

which, or who, proposes to enter into a contract with BW.

### **Integrity**

Employees should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their duties.

Such influences include :

- advice to, or advocacy for, individuals or organisations with a commercial relationship or adversarial position with BW.
- outside interests that might conflict with BW.

## **Objectivity**

In carrying out their duties, including procurement of goods and services, recommending awards and benefits, and raising invoices, employees should make choices on merit and in the public interest.

### *Objectivity*

is the state of mind that requires reference to all considerations relevant to the task in hand but to no other.

Objectivity could be adversely affected if :

- business gifts or
- hospitality

have been received.

## **Accountability**

Employees are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate.

Accountability includes ensuring

- authorisation to ensure that proper responsibility is taken for all transactions and activities before they take place and are in accordance with delegation arrangements.
- separation of duties, especially between those who place orders and those who receive the services, and those who authorise payments.

## **Openness**

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

### *Competition*

- while bearing in mind the advantages of maintaining a continuing relationship with a supplier, any arrangement which might, in the long term, prevent the effective operation of fair competition, should be avoided.
- no special treatment should be given to current or recent employees or their partners in awarding contracts to them.

## **Honesty**

Employees 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.

### *Declaration of interest*

- any personal interest which may impinge or might reasonably be deemed to by others impinge on an employee's impartiality in any matter relevant to his or her duties should be declared in writing to the individual's line manager.
- when it is not easy to decide between what is and is not acceptable in terms of gifts or hospitality, the offer should be declined or advice sought from your line manager.
- having raised this matter with your line manager you may be asked to agree specific safeguards to minimise the risk of conflict.
- such information will remain confidential within BW.

## **Leadership**

Employees should promote and support these principles by leadership and example.

## **Practical guidance notes on the code of conduct**

### **Business gifts**

Business gifts other than items of very small intrinsic value such as business diaries or calendars should not be accepted.

### **Hospitality**

Modest hospitality is an accepted courtesy of a business relationship. However, the recipient should not allow him or herself to reach a position whereby he or she might be or might be deemed by others to have been influenced in making a business decision as a consequence of accepting such hospitality. The frequency and scale of hospitality accepted should not be significantly greater than BW would be likely to provide in return.

To help you decide what is acceptable, would you be happy for BW Monthly to include an article about the gift you accepted?

### **Outside work**

Employee activities outside of work are generally their own personal concern. However, they should not put themselves in a position where BW duties and private interests conflict. With this in mind, employees should obtain prior approval before undertaking outside work, remunerated or not, on any matter connected with their official duties.

## **Dealing with worries**

All employees have a responsibility to uphold the reputation of BW and to ensure that it acts in accordance with best practice. BW gives high priority to achieving such standards.

Employees are encouraged to raise worries they may have where there is any risk to BW's reputation or where any of the standards are not being met. The concerns should be taken to their line manager or, if they so wish, to any Director or to the Head of Audit. Any worries will be dealt with discretely and confidentially.