



Revised Code of Conduct for Employees

Committee Personnel

Date of meeting 26 August 2022

Date of report 16 August 2022

Report by Director of Finance & Corporate Support

1. Object of report

To recommend approval of the revised Code of Conduct for Employees, which has been subject to consultation with the recognised Trade Unions.

2. Background

- 2.1 SPT's Code of Conduct for Employees mirrors, where practical, the Model Code of Conduct for Devolved Public Bodies which was last updated and published by the Scottish Government in December 2021.
- 2.2 SPT's Code of Conduct for Employees was last reviewed in September 2018, and since this time there have been a number of organisational changes including job titles where posts are designated as politically restricted.
- 2.3 SPT's recognised Trades Unions have been consulted on all changes to the Code of Conduct for Employees prior to implementation.

3. Outline of proposals

- 3.1 As part of SPT's review of the Code of Conduct for Employees, the Code has been updated to reflect the changes in the Model Code of Conduct for Devolved Public Bodies and good practice.
- 3.2 The Code has been rewritten in the first person, as recommended by the Model Code of Conduct and updated to include all of the key principles set out by the Nolan Committee on Standards in Public Life.
- 3.3 A summary of the recommended changes is attached at Appendix 1 with the full draft Code of Conduct for employees attached at Appendix 2.

4. Conclusions

SPT's Code of Conduct for Employees has been updated to reflect the latest best practice. A summary of changes to the Code of Conduct and proposed new Code of Conduct are attached at Appendices 1 and 2 for information. Trade Unions, Unite the Union and Unison have been consulted prior to adoption of the updated Code of Conduct for Employees.

5. Committee action

The committee is recommended to approve the attached Code of Conduct for Employees, which has been subject to consultation with the recognised Trade Unions.

6. Consequences

Policy consequences	<i>Code of Conduct updated to reflect Scottish Government Model Code of Conduct and good practice.</i>
Legal consequences	<i>Code of Conduct complies with legislation.</i>
Financial consequences	<i>None.</i>
Personnel consequences	<i>HR to ensure the changes are communicated to all SPT employees.</i>
Climate Change, Adaptation & Carbon Consequences	<i>None directly.</i>
Equalities consequences	<i>None envisaged.</i>
Risk consequences	<i>Not updating the Code of Conduct may result in non-compliance with the Scottish Government Model Code of Conduct and good practice.</i>

Name Neil Wylie

Title **Director of Finance & Corporate Support**

Name Valerie Davidson

Title **Chief Executive**

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APPENDIX 1

Summary of Changes to Code of Conduct

Current Section No.	New Section No.	Contents	Reason for Changes	Revised/Key features
			New Front Page	
			New 2 nd Page	Table of Contents and Appendices
			Global Change	Rewritten in 1 st person to reflect standard contained within Scottish Government Code of Conduct
1.	1.	Introduction		
1.1 to 1.4			Numbering removed	Introductory paragraphs.
	Paragraph 1.		To include reference to damage to the organisation and staff	Additional sentence “A breach of trust damages an organisation and all staff who work for that organisation.”
	Paragraph 2.		To include seeking guidance from Manager.	Last sentence updated to “they should seek guidance from their Manager, Head of Department of Director.”
	Paragraph 3.		To include reference to reporting to Manager and that no employee being disadvantaged.	First sentence updated to “they must report it to their Manager, Head of Department of Director.” Additional sentence “No employee will be disadvantaged as a result of reporting any matter where that has been done in good faith.”
2.	2.	Consequences of Breaching the Code		
	Line 1.		Word change	Word “could” replaced by “may”.

Current Section No.	New Section No.	Contents	Reason for Changes	Revised/Key features
	Line 2.		Word change	Word “Obviously” removed.
3.	3.	Standards		
3.1			Numbering removed and new introductory paragraph added written in the 1 st person	“The Code of Conduct has been based on the following key principles set out by the Nolan Committee on Standards in Public Life. As an employee of SPT I will carry out my duties to the highest standards and I will behave in accordance with these principles. I understand that they should be used for guidance and interpreting the provisions in the Code.”
	3.1		To add the key principle after Duty.	“I have a duty to uphold the law and act in accordance with the law and the public trust placed in me. I have a duty to act in the interests of SPT of which I am an employee and in accordance with the core functions and duties of that body.”
3.2-3.8	3-2.3.8		Rewritten in the 1 st person	
	3.9		To add the key principle “Respect”	“I must respect all employees of SPT, appointed and elected members and the role they play, treating them with courtesy at all times. Similarly, I must respect members of the public when performing my duties as an employee.”
4.	4.	Recruitment		
4.1			Numbering removed - introductory statement only	
4.2-4.6	4.1-4.5		Renumbered and rewritten in 1 st person	
5.	5.	Political Neutrality		
5.1	5.1		Word change	Word “the” added before “individual” on line 3. Word “is” added before “therefore” on line 4.
5.2	5.2		Rewritten in the 1 st person	

Current Section No.	New Section No.	Contents	Reason for Changes	Revised/Key features
5.3	5.3		Rewritten in the 1 st person Title/responsibility change	“Chief Executive or the ACE” changed to “Chief Executive or Partnership Secretary” – lines 1 to 3.
6.	6.	Restrictions of Political Activity		
6.1-6.6	6.1-6.6		Rewritten in the 1 st person	Most grievances can be resolved quickly and informally through discussion with an employee’s line manager. Accordingly, if an employee feels aggrieved about an issue, it should be raised in the first instance, without undue delay, with their line manager. If the grievance is about or involves the line manager then it should be raised with the next level manager.
6.4	6.4		Parliament changes	Reference to “European” parliament removed. Reference to “British” parliament updated to read “United Kingdom”.
7.	7.	Relationship with the Community		
			Rewritten in the 1 st person	
8.	8.	Relationship with Contractors		
8.1-8.6	8.1-8.6		Rewritten in the 1 st person	
8.1			Reference to standing orders expanded	“This section of the Code of Conduct should be read in conjunction with Strathclyde Partnership for Transport’s Standing Orders Relating to Contracts (CSO’s).”
8.2			Word change	“SPT’s contract standing orders” changed to SPT’s CSO’s”.
8.5			Title/responsibility change	The register of interests will now be maintained by the Audit & Assurance Manager and not the ACE.
	9.	Confidentiality		
	9.1-9.5		New section	New section “Confidentiality” included to reflect standard contained within Scottish Government Code of Conduct – General Conduct section.
9.	10.	Personal Interests		
9.1-9.3	10.1-10.3		Renumbered and rewritten in 1 st person	

Current Section No.	New Section No.	Contents	Reason for Changes	Revised/Key features
	10.3		Title/responsibility change	Change - "inform Head of Department, Director of ACE" changed to read "inform Head of Department, Director or Chief Executive". Change – The register of interests will now be maintained by the Audit & Assurance Manager and not the ACE.
10.	11.	Acceptance of Other Employment		
10.1 – (1) to (3)	11.1 – (1) to (3)		Renumbered and rewritten in 1 st person	
11.	12.	Acceptance of Other Activities		
11.1	12.1		Renumbered and rewritten in 1 st person Word change	Change – "club or associated" added to line 2. Change – "or could be considered to bring the organisation into disrepute" added to line 3.
11.2	12.2		Renumbered and rewritten in 1 st person Word change	Change – "services" changed to "service" line 2. Change – "provided they are authorised by my Head of Department/Director" added to line 3.
12.	13.	Acceptance of Hospitality, Gifts or Favours		
12.1-12.5	13.1-13.5		Renumbered and rewritten in 1 st person	
12.3	13.3		Title/responsibility change	Change – The register of gifts and hospitality will now be maintained by the Audit & Assurance Manager and not the ACE.
12.5	13.5		Title/responsibility change	Change – Gifts and hospitality to be passed over to the Audit & Assurance Manager and not the ACE.
13.	14.	Sponsorship – Giving and Receiving		
13.1-13.2	14.1-14.2		Renumbered and rewritten in 1 st person	
14.	15.	Corruption		
4.1-14.2	15.1-15.2		Renumbered and rewritten in 1 st person	
15.	16.	Openness and Disclosure of Information		

Current Section No.	New Section No.	Contents	Reason for Changes	Revised/Key features
15.1-15.7	16.1-16.7		Renumbered.	
15.2	16.2		Title/responsibility change	Change – “Solicitor” changed to “Senior Solicitor”.
15.5	16.5		Title/responsibility change	Change – “Communications department” to “Media & Public Affairs Manager (or Chief Executive in their absence).”
		Appendix A – Posts Designated by SPT As Politically Restricted		
		Job Titles and Department’s reviewed/updated to reflect current structures.		
		Appendix B – Guidance Relating to Gifts and Hospitality Registration		
		Rewritten in 1 st person and reviewed/updated to reflect change of responsibility.		
		Appendix C – Social Media Best Practice		
		Rewritten in 1 st person and reviewed/updated to reflect changes in social media since last publication in 2018.		
		Appendix D – Guidance on the Register of Interests		
		Rewritten and reviewed/updated to reflect new process and responsibilities.		



STRATHCLYDE PARTNERSHIP FOR TRANSPORT

CODE OF CONDUCT FOR EMPLOYEES

August 2022



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Appendices:

- A Posts Designated by SPT as Politically Neutral
- B Guidance Relating to Gifts and Hospitality Registration
- C Guidance on Register of Interests
- D Social Media Best Practice



1. Introduction

The reputation of Strathclyde Partnership for Transport (SPT) and the trust the public have in its integrity is of great importance. A breach of trust damages an organisation and all staff who work for that organisation. This code is a set of **minimum** standards of conduct for employees that, when followed, ensure that SPT's reputation and integrity is maintained. This code is founded on the now well established principles of public life and is consistent in that regard with all other public service organisations.

The central message of this code is that employees are responsible for their own conduct and meeting the standards of this code. However, if any employee, having consulted this code, is in a situation where they are still uncertain as to what is the correct course of action, they should seek guidance from their Manager, Head of Department or Director.

If an employee becomes aware of any contravention of these standards they must report it to their Manager, Head of Department or Director. No employee will be disadvantaged as a result of reporting any matter where that has been done in good faith.

This Code of Conduct applies to **all** employees, unless in the case of certain of its provisions it is otherwise stated.

2. Consequences of Breaching the Code

If an employee contravenes this code then this may result in disciplinary action being taken against them. The seriousness of the disciplinary action taken will reflect the seriousness of the breach of the code. It must be understood that the fundamental principle on which this code is based is that of mutual trust and confidence between SPT and its employees. Therefore, if a breach is of sufficient seriousness a complaint of gross misconduct could result.

3. Standards

The Code of Conduct has been based on the following key principles set out by the Nolan Committee on Standards in Public Life. As an employee of SPT I will carry out my duties to the highest standards and I will behave in accordance with these principles. I understand that they should be used for guidance and interpreting the provisions in the Code.

3.1 Duty

I have a duty to uphold the law and act in accordance with the law and the public trust placed in me. I have a duty to act in the interests of SPT of which I am an employee and in accordance with the core functions and duties of that body.

3.2 Selflessness

I have a duty to take decisions based solely on the best interests of SPT. I must not act in order to gain financial or other material benefit for myself, family or friends.



3.3 Integrity

I must not place myself under any financial, or other, obligation to any individual or organisation that might reasonably be thought to influence me in the performance of my duties.

3.4 Objectivity

I must make decisions solely on merit and in a way that is consistent with the functions of SPT when carrying out its business including making appointments, awarding contracts or recommending individuals for rewards and benefits.

3.5 Accountability

I am accountable to SPT for my decisions and actions. I have a duty to consider issues on their merits, taking account of the views of others and I must ensure that SPT uses its resources prudently and in accordance with the law.

3.6 Openness

I have a duty to be as open as possible about my decisions and actions, giving reasons for my decisions and restricting information only when the wider interest of SPT clearly demands.

3.7 Honesty

I have a duty to act honestly. I must declare any private interests relating to my duties and take steps to resolve any conflicts arising in a way that protects the interests of SPT.

3.8 Leadership

I have a duty to promote and support these principles by leadership and example, and to maintain and strengthen the public's trust and confidence in the integrity of SPT and its employees in conducting its business.

3.9 Respect

I must respect all employees of SPT, appointed and elected members and the role they play, treating them with courtesy at all times. Similarly, I must respect members of the public when performing my duties as an employee.

4. Recruitment

This section of the code should be read in conjunction with SPT's Conditions of Service : General, Section G.

4.1 Appointments will be made on the basis of merit.

4.2 Where I am, in any given instance, responsible for all or part of the recruitment and selection process and I am related to or have a personal relationship with any applicant I must disclose that relationship to the Director of Finance & Corporate Support at the earliest opportunity prior to interview process commencing. The Director of Finance &



Corporate Support will advise on how the recruitment/selection process will be conducted in these circumstances.

- 4.3 I understand that no relative of a Manager, Head of Department, Director or Chief Executive will be offered an appointment with SPT without consultation with the Director of Finance & Corporate Support.
- 4.4 I understand that no job applicant should attempt to solicit support for their application from members of the Partnership or employees of SPT. Should they do so I understand that candidate will be automatically disqualified from further consideration for that post.
- 4.5 I will not take part in procedures or processes relating to discipline, pay or performance of a relative or other member of staff with whom I have a personal relationship.

5. Political Neutrality

- 5.1 Mutual respect between employees and members of the Partnership is essential to the efficient operation of the organisation. However, close personal familiarity between employees and the individual members of the Partnership can be detrimental to an effective working relationship and is therefore best avoided.
- 5.2 If, as part of my duties, I am required to give advice to members of the Partnership. I understand that when doing so I have a duty of impartiality and objectivity. When political groups seek advice from me, I will observe the following procedure.
- 5.3 The leader of the political group concerned must approach the Chief Executive or the Partnership Secretary. The group leader must state what type of advice they are seeking. The Chief Executive or the Partnership Secretary will then determine whether attendance at the meeting is appropriate and if it is which employees should attend. The appropriate employee(s) will then be notified. Once the employee has given their advice to the political group concerned, the employee must then leave the meeting before any decision is made. The employee must observe strict confidentiality; discussion in one political group must not under any circumstances be disclosed to another political group or to any member of such group.

6. Restrictions on Political Activity

- 6.1 I understand that it could be viewed that certain types of political activity would, if undertaken by an employee of SPT, be considered as inappropriate or be open to misinterpretation when such an employee is meant to be objective and impartial.
- 6.2 In order to prevent such misinterpretation, I am aware that certain posts within the organisation will be designated as politically restricted and employees holding these posts will have certain restrictions placed on them in terms of what political activities they can undertake.
- 6.3 If I am elected as a councillor to any council whose area falls within the remit of SPT then I understand that I will have to resign from the employment of SPT.
- 6.4 I understand that politically restricted post holders will be precluded from undertaking a much broader range of activities. In addition to the relevant local councils I am aware that if I stand as a candidate for the United Kingdom or Scottish Parliament I would



have to resign from the employment of the SPT.

- 6.5** In addition, if I hold a 'politically restricted post' I will not be able to act as an agent or officer for a political party, nor canvas or engage in public speaking for a political party.
- 6.6** A complete list of politically restricted posts is attached at Appendix A to this document. This list comprises the following posts: all Heads of Department, Directors and Chief Executive. The list also includes posts which give regular policy advice to the Partnership or represent the Partnership to the media.

7. Relationship with the Community

I will always remember my responsibilities to the community and general public which I serve. I will be courteous, efficient and impartial in the delivery of a service to all groups and individuals within that community.

8. Relationship with Contractors

- 8.1** This section of the Code of Conduct should be read in conjunction with Strathclyde Partnership for Transport's Standing Orders Relating to Contracts (CSO's). All employees involved in the administration and awarding of contracts should familiarise themselves with these standing orders.
- 8.2** All orders and contracts must be awarded in accordance with SPT's CSO's.
- 8.3** Where I have access to confidential information on tenders or costs for contractors I will not disclose such information to any unauthorised party or organisation.
- 8.4** I will adhere to the appropriate procedures when awarding contracts, as stated above. I will not show favouritism to businesses run by, for example, friends, partners or relatives. I have a duty to ensure that all aspects of the Equality Act are adhered to in the procurement of works, goods or services.
- 8.5** Where, as part of the duties of my post, I engage or supervise contractors, and have a relationship in a private or domestic capacity with such contractors, I will declare that relationship before the award of contracts. The register of interests is maintained by the Audit & Assurance Manager.
- 8.6** Where, as part of the duties of my post, I engage or supervise contractors, I must not derive any financial and/or material benefits as a result of that responsibility or relationship other than their proper remuneration.



9. Confidentiality

- 9.1** I will not disclose confidential information or information which should reasonably be regarded as being of a confidential or private nature, without the express consent of the Chief Executive or Director authorised to give such consent, or unless required to do so by law. If I cannot obtain such express consent, I will assume that it is not given.
- 9.2** I understand that confidential information can include discussions, documents, and information which is not yet public or never intended to be public and information deemed confidential by statute.
- 9.3** I will only use confidential information to undertake my duties as an SPT employee. I will not use it in any way for personal advantage or to discredit SPT.
- 9.4** I understand that these confidentiality requirements do not apply to protected whistleblowing disclosures made to the prescribed persons as identified in SPT's Whistleblowing Policy.
- 9.5** I understand that all information, emails, correspondence etc received while undertaking my duties remains in the ownership of SPT during and after my period of employment.

10. Personal Interests

- 10.1.** I have an obligation to act in the best interest of SPT and to avoid situations where there may be a potential, or reasonably perceived, conflict of interest.
- 10.2.** I must not allow any private interest, whether it is of a financial or non-financial nature, to influence my decisions at work. This includes an interest that a family member or partner (or people living in the same household) may have in the work of SPT.
- 10.3.** If I have a private interest which might reasonably be seen as, or perceived to be, influencing my work decisions I will inform my Head of Department, Director or Chief Executive of that interest. The register of interests is maintained by the Audit & Assurance Manager, and notifications should be made in writing or email.

11. Acceptance of Other Employment

- 11.1** With the exception of Head of Department/Director or Chief Executive, no restrictions shall be placed on employees undertaking other employment of a remunerative nature outwith their normal working hours. If I accept other employment I will:
 - (1) provide SPT with sufficient detail about the hours and patterns of work involved in such other employment to allow SPT to carry out a risk assessment as legally required under the Working Time Regulations and other health and safety legislation;
 - (2) ensure the additional employment does not interfere with or adversely affect my ability to carry out my duties efficiently for SPT; and



- (3) ensure the additional employment is not with any individual or organisation with which SPT does business **or** where the business of that individual or organisation affects the interests of SPT.

The onus is on me to ascertain whether any conflict occurs and to make the Head of Department/Director aware of this in the first instance.

12. Acceptance of Other Activities

- 12.1.** During my employment with SPT, I will not hold office or undertake activities in or for another organisation, club or association which would cause me to be absent from work, or could be considered to bring the organisation into disrepute, unless SPT gives its consent for this to happen.
- 12.2.** I may be absent occasionally and temporarily during business hours to attend to duties or service of an honorary, charitable or philanthropic character, provided they are authorised by my Head of Department/Director. These duties or services however must not interfere with my ability to discharge my duties efficiently.

13. Acceptance of Hospitality, Gifts or Favours

- 13.1.** I will treat with caution any offer of gifts, hospitality or favour made to me. I understand that the person or organisation making the offer may be doing or seeking to do business with the Partnership or seeking a decision from the officer which is favourable to them.
- 13.2.** I will only accept offers of hospitality if there is a business networking opportunity or for sharing of information or representing the Partnership in the community. I will accept invitations to attend purely social functions only when it is necessary that the Partnership be represented.
- 13.3.** I will ensure that the acceptance of hospitality is properly authorised by the appropriate Head of Department or Director. I will follow the separate guidance - Appendix B - on the acceptance of gifts and hospitality closely. The register of all gifts and hospitality offered and received or declined is maintained by the Audit & Assurance Manager.
- 13.4.** I will not accept significant personal gifts from contractors or suppliers although I am aware that I may be allowed to keep insignificant token gifts up to a value of £20. I will follow the separate guidance issued closely.
- 13.5.** When declining a gift, I will be courteous but firm. If I believe that it would be discourteous to reject a gift then I will ensure that I pass it over to the Audit & Assurance Manager who will arrange for it to be donated to a worthy cause. A record of this will be maintained.

Note: with regard to Sections 11. to 13. it is in your best interests to make SPT aware of any other employment, activities and hospitality, gifts or favours. If you are in any doubt, you should speak to your Line Manager or HR.



14. Sponsorship – Giving and Receiving

- 14.1.** Where an outside organisation wishes to sponsor or is seeking to sponsor a Partnership activity, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts or hospitality apply. I understand that particular care must be taken with contractors or potential contractors.
- 14.2.** Where SPT wish to sponsor an event or service I understand that neither an employee, or any partner, spouse nor relative of an employee may benefit from such sponsorship in a direct way without disclosing such benefit to their Head of Department, or Director.

15. Corruption

- 15.1.** I am aware that it is a criminal offence for me while acting in my official capacity to corruptly receive or give any gift, loan, fee or advantage for doing or not doing anything or showing favour or disfavour to any person.
- 15.2.** I am aware that I should ensure that I am familiar and comply fully, with SPT's counter fraud and whistleblowing policies.

16. Openness and Disclosure of Information

- 16.1.** The decision making process within SPT must be as transparent and open as possible. SPT will provide the public with clear and accessible information about how it operates and the decisions it arrives at.
- 16.2.** It should be noted that there are exceptions to the principle of openness. These exceptions occur when a duty of confidentiality is involved. That is when disclosure of information would compromise a right of personal or commercial confidentiality. If an employee is in any doubt as to whether information can be disclosed they should consult with their Head of Department or Director. They in turn should seek advice from the Partnership's Senior Solicitor.
- 16.3.** Employees should not use any information obtained in the course of their employment for personal gain nor divulge it to others who might so use it.
- 16.4.** Employees must not make statements concerning SPT or its operations, its staff or Partnership members to the media. Employees must not make derogatory statements regarding SPT, its operations, its staff or Partnership members on social media forums. To do so without authority will be considered as a breach of organisational governance and will be considered as a breach of the code. Specific guidance relating to social media is contained at Appendix D.
- 16.5.** All media enquiries should be referred to the Media & Public Affairs Manager (or Chief Executive in their absence). The reason for such a rule is to allow the Partnership to issue a statement itself after proper consideration of the facts.



- 16.6.** Any article, publication or interview given on aspects of the Partnership's Policy or affairs written or given by an employee must be authorised by the Partnership (Chief Executive).

- 16.7.** If an employee has concerns with regard to some or any aspect of SPT's operation they should notify their Supervisor or Manager or if they have reasonable grounds for believing that any malpractice is occurring within SPT they have recourse to the provisions of SPT's Whistleblowing Policy (Appendix 3 to the Counter Fraud Strategy).



APPENDIX A

POSTS DESIGNATED BY SPT AS POLITICALLY RESTRICTED

Job Title	Department
Assistant Chief Executive	Chief Executive Unit
Audit & Assurance Manager	Chief Executive Unit
Bus Development Manager	Bus Strategy & Delivery
Chief Accountant	Finance & Corporate Support
Chief Executive	Chief Executive Unit
Contact Centre Manager	Finance & Corporate Support
Digital Manager	Digital
Director of Finance & Corporate Support	Finance & Corporate Support
Director of Subway	Subway
Head of Bus Strategy & Delivery	Bus Strategy & Delivery
Head of Engineering	Subway
Head of HR	Finance & Corporate Support
Head of Operations & Security (Bus)	Finance & Corporate Support
Head of Operations & Security (Subway)	Subway
Head of Policy & Planning	Chief Executive Unit
Head of Projects	Subway
Head of Service Availability & Maintenance	Subway
Head of Transformation	Subway
Information Governance Officer	Chief Executive Unit
Media & Public Affairs Manager	Chief Executive Unit
Network Analysis & Design Manager	Bus Strategy & Delivery
Principal Policy Officer	Chief Executive Unit
Principal Transport Planner	Chief Executive Unit
Schools Agency Services & Compliance Manager	Bus Strategy & Delivery
Senior Procurement Officer	Finance & Corporate Support
Senior Solicitor	Chief Executive Unit
Ticketing Commercial Team Leader	Finance & Corporate Support

List of posts will be reviewed and amended on an ongoing basis to reflect the organisational structures and priorities.



APPENDIX B

GUIDANCE RELATING TO GIFTS AND HOSPITALITY REGISTRATION

I understand that I may be offered gifts, hospitality and/or material benefits or services as part of my duties as an employee of Strathclyde Partnership for Transport.

I **will never** ask for, nor seek **any** gifts, hospitality or material benefits or services.

I will refuse any gift, hospitality or material benefits or services, unless it is:

- a minor item or token of modest intrinsic value offered on an infrequent basis;
- a gift being offered to Strathclyde Partnership for Transport;
- approved in advance by a member of the Strategy Group.

I will consider whether there could be a reasonable perception that **any** gift, hospitality or material benefits or services received by me could or would influence my judgement.

I will not allow the promise of money or other financial advantage to induce me to act improperly in my duties as an employee. I accept that the money or advantage does not have to be given to me directly. The offer of monies or advantages to others may amount to bribery, if the intention is to induce me to improperly perform my duties. I will report any instances where I reasonably believe this to be the case.

I will never accept **any** gift, hospitality or material benefit or service from any individual, applicant or organisation who is awaiting a decision from, or seeking to do business with Strathclyde Partnership for Transport.

I will familiarise myself with the terms of the Bribery Act 2010, as set out in the Counter Fraud Strategy (see SPT's Governance Manual, Appendix 4 - <http://spt.intranet.uk/publications/corporategovernance/Governance-Manual.pdf>), which makes it a criminal offence to give, promise or offer a bribe and to request, agree to receive or accept a bribe either at home or abroad.

If a gift or hospitality is approved by a member of the Strategy Group, details of the gift or hospitality should include the description/format (eg lunch/dinner), details of who has offered it, the venue and the date. Details must include all employees in receipt of gift or hospitality and must be advised by email within **7 days** of the date of receipt to the Executive Assistant to the Chief Executive.

The Executive Assistant to the Chief Executive will record all received notifications in the central register. This information will be subject to scrutiny by the Audit & Assurance Manager in the first instance and used to publish the register of gifts and hospitality received on the website.



APPENDIX C

GUIDANCE ON THE REGISTER OF INTERESTS

The main purpose of the Register of Interests is to provide information about any financial interest which an employee has, or any benefit which he or she receives, which others might reasonably consider to influence his or her actions when undertaking his or her prescribed duties.

Employees should always consider how their involvement or relationship with an organisation, club or association may be viewed from out-with SPT.

The interests which I require to register are set out in the following paragraphs:

Remuneration

I will register work for which I receive, or expect to receive, payment. I have a registrable interest where I receive remuneration by virtue of being:

- employed (other than SPT);
- self-employed;
- the holder of an office;
- a director of an undertaking;
- a partner in a firm;
- appointed or nominated by SPT to another body;
- engaged in a trade, profession or vocation or any other work.

Directorships or Office Bearer

I will register any unremunerated directorships or office bearer. I will provide the registered name and registered number of any and all subsidiary or parent company and nature of its business.

Contracts

I have a registrable interest where I am a partner or director or hold shares (more than 1% of the share value) in a company which has tendered for, or provides goods, services or works to Strathclyde Partnership for Transport.

Close Family Members

I have a registrable interest where a close family member does business with, has transactions with, or provides services to Strathclyde Partnership for Transport.

Registration Process

Registrable interests must be advised by email to the Executive Assistant to the Chief Executive.

The Executive Assistant to the Chief Executive will record all received notifications in the central register. This information will be subject to scrutiny on a regular basis by the Audit & Assurance Manager



Employees must register any change to their registrable interests within **one month**.

SOCIAL MEDIA BEST PRACTICE

What is Social Media?

Social media includes social platforms and apps that enable users to create and share content eg Twitter, Facebook, Instagram, LinkedIn, YouTube, Pinterest, WhatsApp and TikTok. This list is not exhaustive as new platforms appear frequently.

What are Social Networks?

A social networking service is an online service, platform, or site that focuses on building and reflecting of social networks or social relations among people, who, for example, share interests and/or activities. A social network service consists of a representation of each user (often a profile), their social links, and a variety of additional services. Most social network services are web-based and provide means for users to interact over the internet, such as email and instant messaging. Social networking sites allow users to share ideas, activities, events, and interests within their individual networks.

What are Blogs?

Short for “Web log,” a site that allows an individual or group of individuals to share a running log of events and personal insights with online audiences. In short, a diary which can be publicly viewed.

Best Practice

I understand that as an employee and representative of SPT I am expected to demonstrate best practices and appropriate etiquette on social media.

- I will be respectful to all.
- I will not engage in activities on the internet which might bring SPT into disrepute.
- I will not use the internet in any way to attack or abuse colleagues.
- I will not post derogatory or offensive comments on your own page or someoneelse’s.
- I will not reference SPT in any form without prior permission from my line manager, including posting images or confidential information about SPT.

I understand that best practice to safeguard against this would be to **not reveal SPT as my place of work.**

I am aware that during working hours, all SPT employees are not allowed to access social media sites unless their role permits it. I understand that staff can browse social media sites during lunch breaks on their own devices, e.g. via mobile phone or tablet. I am aware that failure to follow this guidance may lead to disciplinary action.



I understand that any online activities associated with my work for SPT should be discussed and approved in advance with my line manager and that I should also use a disclaimer if publishing a blog, posting a comment, referencing SPT in any way or sharing an image that has something to do with the work they do at SPT.

I understand that this means that whether publishing a blog or participating in someone else's, it is made clear that what is said is representative of my individual views and opinions and not necessarily the views and opinions of SPT. As a minimum, I understand that my social media page should include the following standard legal disclaimer language:

The postings on this site are my own and do not represent those of my employer.

I acknowledge that that when posting a comment on someone else's page or feed that it can be traced back to me regardless of whether their page is private or not.

Note to Managers and Supervisors – this standard disclaimer does not by itself exempt SPT managers and supervisors from a special responsibility when using social media. By virtue of their position, managers and supervisors must consider whether personal thoughts they publish may be misunderstood as expressing SPT positions. A manager should assume that his or her team will read what is written. Social media is not the place to communicate SPT policies, standards, guidance or procedures nor to announce SPT news. Do not cite or reference clients, partners or suppliers without their prior approval. When SPT wishes to communicate publicly – whether to the marketplace or to the general public – it has well-established processes to do so. Only those officially designated by SPT have the authorisation to speak on behalf of the company.

Consideration towards members of staff when using social networking sites:

I understand that social networking sites allow photographs, videos and comments to be shared with potentially thousands of other users. I am aware that it may not be appropriate to share work-related information in this way. I am aware that there may be an expectation that photographs taken on SPT property or at a private SPT event will not appear publicly on the internet, both from those present and perhaps those not at the event. I will be considerate to my colleague(s) in such circumstance and I will not post information when I have been asked not to. I will remove information about a colleague(s) if that colleague(s) asks me to do so.

Under no circumstance will I make offensive comments about SPT colleagues on the internet. I understand that this may amount to cyber-bullying and could be deemed a disciplinary offence.

Open Access Online Encyclopedias

I understand that in the course of SPT work, I may find errors in online encyclopedias. I am aware that if I edit online encyclopedias at work, the source of the correction will be recorded as a SPT IP address and the intervention may therefore look as if it comes from SPT itself. In the first instance I will discuss the change with my manager, act in a manner that does not bring SPT into disrepute, and not post derogatory or offensive comments on any online encyclopedias.



Questionable Content

If/when I come across misinformation regarding SPT on social media I understand that I am expected to notify my line manager for SPT's marketing team to investigate.

Security

I will exercise caution when using social media. I understand that not everyone using social media is necessarily who they say they are. I will always take time to check if I **know** the person, and if the friend/link/follow is genuine.

I will think about my digital footprint, which is a term used to describe the entirety of information that I post online, including photos and status updates. I understand that criminals can use this publicly available information to steal my identity, or use it to make phishing messages more convincing. I will always:

- Think about **what** I'm posting, and **who** has access to it. How I have configured the privacy options so that it's only accessible to the people I want to see it?
- Consider what my followers and friends **need** to know, and what detail is unnecessary (but could be useful for criminals).
- Have an idea about what your friends, colleagues or other contacts say about **you** online.