

# Code of Conduct





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# How we behave says who we are

This Code of Conduct reflects our commitment to cultural relations work that is ethical, has integrity, and has the well-being, inclusion and fair treatment of our colleagues and the people we work with at its heart.

It sets out the values, standards and behaviours we expect and require from everyone, in whatever capacity and wherever they work: either for, with or on behalf of the British Council. Each year, our work reaches millions of people, and how we work is just as important as what we do. Our values – open and committed, expert and inclusive, optimistic and bold – represent how we should approach our work and they guide our decision making.

Cultural relations is an exchange of values just as much as it is the exchange of ideas, knowledge and experience. If we want to build trust and persuade the world that the United Kingdom has a culture and people worth understanding and engaging with, then we must demonstrate our values through our own behaviour.

This Code of Conduct sets out general principles. It does not cover everything and should be read alongside our policies and guidance, which you should also familiarise yourself with. There is a link to some of these policies within this Code.

The principles in the Code apply to all our staff worldwide and must be adhered to unless local law restricts this in some way. If you believe such a restriction exists, please consult Corporate Affairs.

If in doubt about any aspect of this Code you should seek guidance from a manager or from your Human Resources business partner.

**Kate Ewart-Biggs**  
Interim Chief Executive



# Our values

**Our values underpin everything we say and do, how we work with people and behave towards them, and how we communicate.**

Here is a brief description of what each one means to us:

## Open and committed

Our belief in what we do translates into a deep and long-term commitment to the people we work with and the places where we work. We tackle challenges and take responsibility with openness and honesty to bring about positive change.

## Expert and inclusive

Inclusion is at the heart of everything we do. By involving everyone in the conversation we learn from each other and bring together all of our experience, knowledge and expertise to do the best work that we can.

## Optimistic and bold

We believe in the potential of young people to create a better world. Inspired by this optimism, we are positive and creative and we focus on what works. We are not afraid to make bold choices to shape a better future for everyone.

# Principles

## 1. Equality, diversity and inclusion

Equality, diversity and inclusion are integral to our cultural relations work. This means we commit to ensuring that there is no discrimination on the basis of any of the following: age, disability (including HIV/AIDS status), gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Our equalities policy sets out more information on this.

## 2. Legal compliance

### Respecting local legislation

We are committed to complying with the law in all the countries and territories in which we work. This is a fundamental principle and we must follow it in all our dealings and behaviours.

In addition, all British Council activities must comply with the UK's charity law and be for the public benefit as well as comply with the 7 Principles of Public Life, which are here: <https://www.gov.uk/government/publications/the-7-principles-of-public-life>

## 3. Health and safety

### Looking after people

We should make every reasonable effort to ensure the health and safety of everyone who works for us, wherever they may be working, and comply with local law. This includes visitors, students, contractors, colleagues and others using our premises or involved in our work as well as our own health and safety.

## 4. Safeguarding

We have a responsibility to protect children, young people and vulnerable adults who engage in activities with us from abuse, harm, exploitation and neglect, and to create a safe environment for them. This includes the prevention of illegal exploitation of people for personal or commercial gain. Colleagues managing our relationships with third party suppliers and partners have an important role in ensuring those third parties comply with safeguarding policies.

## 5. Working with others and upholding public trust

### Behaving ethically and responsibly

Behaving with integrity helps build trust and confidence and enhances our reputation. Therefore, we must never abuse or harm our colleagues, customers, clients, partners, associates or any member of the public.

When dealing with everyone whether that be customers, clients, partners, suppliers, fellow employees and others, we should all act in accordance with our values and relevant policies. The way those values are put into practice will depend upon the relationship we have with the person we are dealing with and our relevant policies but will normally involve treating people fairly, competing fairly, taking the time and trouble to understand what others require and providing them with a professional response which deals with their specific requirements.

### Working together

We should always treat people in accordance with our values and as a global organisation show respect for local cultures and customs.

## 6. Information governance and confidentiality

### Information about the British Council: transparency, freedom and security of information

Wherever appropriate we should be proactive in sharing necessary information in support of the UK government's transparency agenda.

We must also meet our legal obligations to provide certain information to the general public on request.

At the same time, information must be appropriately protected and used. We must not share confidential information or material with anyone who is not entitled to that information whether they are inside or outside the British Council. We must properly protect private, personal and sensitive information relating to all who work with, for and on behalf of us from wrongful disclosure, modification or destruction.

We must use British Council equipment and systems responsibly and appropriately. This includes controlling access and avoiding inappropriate use of the British Council's hardware, software, internet and email.

These requirements cover information held in physical or electronic form and on any system, including those provided by the British Council and our suppliers (including free public Cloud services and chargeable Cloud services).

We must all familiarise ourselves with the relevant policies and act in accordance with them.



### 7. Looking after our reputation

We should never behave at work, in public or online in a manner that may damage the British Council's reputation.

#### Making public statements

We must only make statements to external stakeholders, customers and partners if the statements maintain or enhance our reputation. We should not make statements about politics or on any subject that may damage our reputation or cause a loss of confidence in the British Council. This applies whether we are making comments about the British Council itself, or organisations or people associated with the British Council.

Only those authorised to talk to the media on behalf of the British Council may do so. If you believe that you need to talk to the media as a part of your role, please contact Corporate Communications.

#### Communicating online

Online communications include email, websites and social media such as blogs, messaging apps, Facebook, YouTube and Twitter.

You should always be conscious of how you may be associated with the British Council in your personal online communications outside of work, and behave appropriately and in line with the British Council's values. Your comments and opinions may be associated with the British Council, especially if you have named your employer in your social media profile or in any prior online conversations.

Do not rely on privacy settings to restrict access to your online comments; you should work on the basis that anything you put online could be made widely available. Using a disclaimer does not protect your comments from being associated with the British Council.

Never be offensive about the British Council or its activities, nor organisations or people associated with the British Council, including colleagues, partners or customers. Do not reveal confidential information or disclose any information that might undermine our reputation or be considered a conflict of interest.

Please refer to the British Council's Social Media Policy for full guidance.

### 8. Financial management and accountability

#### Knowing what is required of us

When we are involved in any aspect of managing resources or assets, or processing or recording financial transactions, we must behave ethically and keep complete and accurate records of decisions and transactions.

### 9. Property and assets

#### Protecting what is ours

We are all responsible for the British Council's property and assets and should take all reasonable measures to protect them from loss or damage.

We should also take security precautions against other less routine risks, such as fire, flood, adverse weather and terrorism.

Information and products developed and owned by the British Council, including copyright, must always be protected. Standards for managing hard copy and electronic documents and records must determine our actions.







## 10. Using funds and resources

We must not abuse, misspend, misappropriate, defraud or pursue any personal or private matter in the use of our funds and resources.

All grants and funding from government and non-government sources must be used in line with the conditions that apply to them.

The delegated authorities must be followed before committing to any expenditure, supply of services or partnerships.

## 11. Gifts, entertainment and payments

### Avoiding unethical rewards and inducements

Our organisation, and we as individuals, must not seek advantage by giving or accepting any gifts, entertainment or payments that may be perceived as inappropriate. We have a detailed policy on gifts and hospitality that you must refer to.

Our conduct should be ethical and justifiable under scrutiny from the press, the public or competitors, and examination by those to whom we are accountable.

We must immediately report any suspected or actual instances of bribery, facilitation payments, fraud or corruption in line with the Raising Concerns policy.



#### Acceptance of official honours

Before accepting an official honour or award, you must seek prior approval from your senior manager. Senior managers must diligently assess the awarding body and guard against potential negative impact on our reputation.

#### No payments to political parties

We must not make donations, directly or indirectly, to political parties or their representatives, although as individuals we are free to do so.

### 12. Conflicts of interest

#### Separating the personal from the professional

We must avoid any activities that are in conflict or competition with our cultural relations work or would prejudice it.

We should not use our position in the British Council for personal advantage or gain. This includes outside business interests or employment, both of which require approval.

#### Other outside activities

Playing an active role in the community and other outside activities helps us experience and contribute to a wider world. However, we should avoid contributions that may damage or reflect badly on us. When expressing views about public or political issues in speech or writing, we should make a clear distinction

between views that are our own and those of the British Council, and be aware that even views expressed as personal could adversely affect the reputation of the British Council by association.

We should think carefully before taking an active part in national, state and provincial party politics. This participation needs senior manager agreement.

### 13. Duty of disclosure

#### Telling us what we need to know

We must always declare any information that may be relevant to our work or impact on it, whether it is requested or not. All disclosures will be treated in confidence and only shared on a need-to-know basis.

#### Legal proceedings

Any involvement in legal proceedings or criminal convictions that may affect your suitability for certain posts (working with children and young people, for example), or that may discredit the British Council or bring it adverse publicity, must be reported and details may be requested.

### 14. Personal relationships

#### Professionalism

Our conduct at work should not be adversely affected by close personal relationships whether with colleagues, consultants, suppliers or others with whom we work or provide a service to.

Therefore, we have policies requiring disclosure of such relationships. Any information shared will be treated in confidence, and we may ask for a change in role or responsibilities.

### 15. Raising concerns

The British Council is committed to upholding the highest ethical and legal standards and has zero tolerance for malpractice or wrongdoing anywhere in the organisation.

Examples of malpractice or wrongdoing include child abuse, theft, fraud, false accounting, misuse of assets, receiving bribes, failing to disclose outside business interests and breaches of regulatory requirements, as well as breaches of this Code of Conduct and other British Council policies.

To help us deal with this, we want people to feel that they can speak up and raise concerns about wrongdoing confidentially. For employees this will normally be through your line manager, your line manager's manager or your HR business partner. If this is not appropriate, then you should refer to our Raising Concerns policy.

Concerns should not be raised to pursue private disputes and malicious false allegations will be regarded as a disciplinary matter.

# Investigating breaches of our Code

We hope you appreciate that this Code is in everyone's interests and will familiarise yourself with it, refer to it and follow it.

As you would expect, breaches of this Code will be investigated and appropriate action will be taken which, for employees, could include disciplinary action.

Thank you for taking the time to read this Code.







## Supporting information

Aspects of the Code of Conduct are supplemented by the global policy statements and further detailed internal policies and guidance for staff available on the intranet. Some relevant global policy statements and internal policies are listed below.

Principle	Policy information
	Note that some of the links below are to internal documents available to staff on the intranet.
1. Equality, diversity and inclusion	<b>Equality policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/equality-diversity-inclusion">https://www.britishcouncil.org/about-us/how-we-work/policies/equality-diversity-inclusion</a>
2. Legal compliance	<b>Partnerships policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/partnerships">https://www.britishcouncil.org/about-us/how-we-work/policies/partnerships</a>  <b>Fair competition policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/fair-competition">https://www.britishcouncil.org/about-us/how-we-work/policies/fair-competition</a>
3. Health and safety	<b>Health and safety policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/health-and-safety">https://www.britishcouncil.org/about-us/how-we-work/policies/health-and-safety</a>
4. Safeguarding	<b>Adults at risk policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/adults-at-risk">https://www.britishcouncil.org/about-us/how-we-work/policies/adults-at-risk</a>  <b>Child protection policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/child-protection">https://www.britishcouncil.org/about-us/how-we-work/policies/child-protection</a>
5. Working with others and upholding public trust	<b>Partnerships policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/partnerships">https://www.britishcouncil.org/about-us/how-we-work/policies/partnerships</a>  <b>Fair competition policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/fair-competition">https://www.britishcouncil.org/about-us/how-we-work/policies/fair-competition</a>
6. Information governance and confidentiality	<b>Security policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/security">https://www.britishcouncil.org/about-us/how-we-work/policies/security</a>  <b>Information security and privacy policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/information-security-privacy">https://www.britishcouncil.org/about-us/how-we-work/policies/information-security-privacy</a>
7. Looking after our reputation	<b>Media and social media policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/media-social-media">https://www.britishcouncil.org/about-us/how-we-work/policies/media-social-media</a>  <b>Freedom of information policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/freedom-of-information">https://www.britishcouncil.org/about-us/how-we-work/policies/freedom-of-information</a>  <b>Records management policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/records-management">https://www.britishcouncil.org/about-us/how-we-work/policies/records-management</a>

Principle	Policy information
	Note that some of the links below are to internal documents available to staff on the intranet.
8. Financial management and accountability	<b>Financial management and reporting policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/managing-public-money">https://www.britishcouncil.org/about-us/how-we-work/policies/managing-public-money</a> <b>Records management policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/records-management">https://www.britishcouncil.org/about-us/how-we-work/policies/records-management</a>
9. Property and assets	<b>Financial management and reporting policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/managing-public-money">https://www.britishcouncil.org/about-us/how-we-work/policies/managing-public-money</a> <b>Anti-fraud and corruption policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/anti-fraud-and-corruption">https://www.britishcouncil.org/about-us/how-we-work/policies/anti-fraud-and-corruption</a> <b>Information security and privacy policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/information-security-privacy">https://www.britishcouncil.org/about-us/how-we-work/policies/information-security-privacy</a> <b>Risk management policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/risk-management">https://www.britishcouncil.org/about-us/how-we-work/policies/risk-management</a>
10. Using funds and resources	<b>Financial management and reporting policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/managing-public-money">https://www.britishcouncil.org/about-us/how-we-work/policies/managing-public-money</a> <b>Anti-fraud and corruption policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/anti-fraud-and-corruption">https://www.britishcouncil.org/about-us/how-we-work/policies/anti-fraud-and-corruption</a> <b>Fair competition policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/fair-competition">https://www.britishcouncil.org/about-us/how-we-work/policies/fair-competition</a>
11. Gifts, entertainment and payments	<b>Anti-fraud and corruption policy statement</b> <a href="https://www.britishcouncil.org/about-us/how-we-work/policies/anti-fraud-and-corruption">https://www.britishcouncil.org/about-us/how-we-work/policies/anti-fraud-and-corruption</a> <b>Gifts and hospitality policy (internal link)</b> <a href="https://britishcouncil.sharepoint.com/Finance/Resources/Policy/Pages/Giftsandhospitalitypolicy.aspx">https://britishcouncil.sharepoint.com/Finance/Resources/Policy/Pages/Giftsandhospitalitypolicy.aspx</a>
12. Conflicts of interest	<b>Conflicts of interest policy (internal link)</b> <a href="https://britishcouncil.sharepoint.com/Finance/Resources/Policy/Pages/Conflictofinterestpolicy.aspx">https://britishcouncil.sharepoint.com/Finance/Resources/Policy/Pages/Conflictofinterestpolicy.aspx</a>
13. Duty of disclosure	<b>Conflicts of interest policy (internal link)</b> <a href="https://britishcouncil.sharepoint.com/Finance/Resources/Policy/Pages/Conflictofinterestpolicy.aspx">https://britishcouncil.sharepoint.com/Finance/Resources/Policy/Pages/Conflictofinterestpolicy.aspx</a>
14. Personal relationships	<b>Conflicts of interest policy (internal link)</b> <a href="https://britishcouncil.sharepoint.com/Finance/Resources/Policy/Pages/Conflictofinterestpolicy.aspx">https://britishcouncil.sharepoint.com/Finance/Resources/Policy/Pages/Conflictofinterestpolicy.aspx</a>
15. Raising concerns	<b>Raising concerns procedure (internal link)</b> <a href="https://britishcouncil.sharepoint.com/hr/05Employee_relations/Pages/RaisingConcerns.aspx">https://britishcouncil.sharepoint.com/hr/05Employee_relations/Pages/RaisingConcerns.aspx</a> <b>Safecall – an independent external route for raising your concerns (internal link)</b> <a href="https://britishcouncil.sharepoint.com/hr/05Employee_relations/Pages/Confidential-hotline---Safecall.aspx">https://britishcouncil.sharepoint.com/hr/05Employee_relations/Pages/Confidential-hotline---Safecall.aspx</a>

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