

January 2013

National Audit Office Code of Conduct

Our vision is to help the nation spend wisely.

We apply the unique perspective of public audit to help Parliament and government drive lasting improvement in public services.

The National Audit Office scrutinises public spending on behalf of Parliament. The Comptroller and Auditor General, Amyas Morse, is an Officer of the House of Commons. He is the head of the NAO, which employs some 880 staff. He and the NAO are totally independent of government. He certifies the accounts of all government departments and a wide range of other public sector bodies; and he has statutory authority to report to Parliament on the economy, efficiency and effectiveness with which departments and other bodies have used their resources. Our work led to savings and other efficiency gains worth more than £1 billion in 2010-11.

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Preface

The NAO must be able to demonstrate that it observes the highest standards of corporate and personal conduct. Our work is concerned with pursuing high standards of probity and propriety in the bodies we audit; we have rights of access to information and to the staff of public bodies; we have a unique role to uphold and promote accountability in the public service; and we have a high public profile. These rights and responsibilities place us under a particular obligation to maintain high standards.

We also subscribe to the professional and ethical standards set by the UK Financial Reporting Council, the International Federation of Accountants, and the INTOSAI Code of Ethics for Auditors in the Public Sector. Our staff are subject to the codes of ethics of their professional institutes.

This Code of Conduct reinforces the core values and standards that underpin the NAO's work, and provides a reference point for decisions and courses of action in carrying out our statutory and professional responsibilities. All of us who serve Parliament as non-executives or employees of the NAO have a duty to conduct ourselves in line with the Code, at whatever level we operate and agree to be bound by its terms. In issuing the Code, therefore, I confirm that I am personally committed to adhere to each of the principles and values contained within it, and to comply in full with its provisions.

AMYAS MORSE

Comptroller and Auditor General

1. Introduction

Values and standards

1.1. Given the NAO's role in providing assurance and advice to Parliament on the way government departments and public bodies use and account for taxpayers' money, the highest standards of corporate and personal conduct are essential, and public service values and professional standards must be at the heart of the way we conduct our business.

1.2 Our Corporate Values -: Independent, Authoritative, Collaborative, Fair, underpin the work of the NAO and must be applied consistently if we are to retain the confidence of Parliament, audited bodies and the wider public. Everything done by those who serve Parliament as non-executives or employees of the NAO must be able to stand the test of Parliamentary scrutiny, public judgements on propriety, and professional codes of conduct.

Scope and application

1.3 The Code of Conduct sets out the framework of professional and ethical behaviour, and is supported by detailed policy statements available on the intranet. Detailed links to the relevant extracts of these documents are provided where appropriate. Non-executives and staff are required to read the Code and supporting policy statements and confirm annually that they have complied with all its provisions. Returns will be made online and records will be maintained by HR.

1.4 The Code applies to all non-executives and staff, including staff on fixed-term and short-term contracts, and inward secondees. Employment agency staff and those contracted to work for or provide services to the NAO are expected to abide by the terms of the Code, although they are not expected to make a declaration. Compliance with the Code is a prerequisite for undertaking any audit work.

1.5 Code of Conduct returns from staff will be used in the process for reviewing and approving their security clearances. Adverse entries (eg arrests or convictions) may result in an individual's security clearance being refused or withdrawn.

1.6 All staff who are members or students of professional bodies must uphold the codes of ethics of those bodies in addition to their obligations under this Code. Staff who are professionally qualified should ensure that they remain competent to undertake assignments, that their knowledge remains up to date in accordance with the requirements of their professional body, and that they are fit and proper persons to undertake their work.

1.7 The Code defines responsibilities but cannot address all the possible issues which staff may face. This places a responsibility on individuals to apply common sense and careful judgement. There may be occasions when further guidance or clarification on

the Code is required if, for instance:

- there are doubts about the application or scope of its provisions;
- there are apparent conflicts with the requirements of professional bodies;
- individuals believe that they are being required to act in a way which is illegal, improper, unethical or in breach of constitutional convention (which may involve possible maladministration), or which involves any other activity covered by the Public Interest Disclosure Act 1998;
- individuals face a fundamental issue of conscience.

1.8 In such circumstances, they should discuss the matter with their Manager, Development Manager or the Director of Human Resources, John McCann. Non-executives should raise any concerns with the Chairman of the NAO Board, Sir Andrew Likierman and should refer any potential conflicts with the provisions of the Code to the Chairman.

1.9 Staff will have protection under the Public Interest Disclosure Act 1998 should they raise concerns about the management and operations of the NAO which they feel have not been adequately addressed. In order to secure such protection disclosure will need to be made in line with the NAO's Internal Whistleblowing policy which is set out in [Chapter 18 of the HR Manual](#).

1.10 This Code may be altered, from time to time, to take account of changed circumstances or new situations. Any amendments will be approved by the Leadership Team and the NAO Board.

1.11 Failure to operate within the terms of the Code may be treated as a disciplinary matter under the managing misconduct procedures for staff set out in [Chapter 19 of the HR Manual](#).

2. Observing our Values

2.1 In undertaking their work, staff must adhere to our Corporate Values. Staff undertaking audit work must also be aware that work should be carried out in accordance with the [UK Financial Reporting Council's International Standard on Quality Control 1](#), [Ethical Standards](#), [International Standards on Auditing \(UK and Ireland\)](#) and [VFM standards](#).

Independent

2.2 The C&AG's independence, and that of NAO staff, is fundamental to the conduct of all the Office's work. We must be objective and impartial in all that we do. Opinions and reports should be influenced only by the evidence obtained and assembled in accordance with the NAO's professional standards. Staff should not prejudge an issue and 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.

2.3 Staff must be independent of audited bodies or other interested groups, and be independently minded and objective in dealing with the issues and topics under review. Staff must not only be independent, but must be seen to be so. Where staff are seconded from organisations which are audited by the NAO, care should be taken over the allocation or routing of work so as to avoid potential conflicts and, where necessary, safeguards should be established. Conflicts of interest are dealt with in detail under section 5 of the Code.

Authoritative

2.4 The NAO's reputation rests on delivering work of the highest quality, drawing comprehensively on robust evidence and practice. Staff are, therefore, expected to demonstrate professional competence and expertise in all that they do and have a responsibility to maintain and develop themselves, through programmes of continuing professional and personal development. Audit staff must also keep up to date with professional guidance, including that issued by the [Financial Audit](#) and [VFM Practice](#) and Quality teams.

2.5 Staff should also maintain the highest standards of personal conduct in performing their work and in their relationships with staff of audited bodies. In addition to complying with the law, they should make decisions solely in terms of the public interest, guided by the highest professional and ethical standards, and not to gain financial or other material benefits for themselves, their family or their friends.

Collaborative

2.7 Staff should work collaboratively with colleagues and stakeholders and be proactive in developing, applying and sharing knowledge to achieve our corporate goals.

2.8 Staff should adopt a constructive and positive approach to their work and relationships and should act for the benefit of the NAO as a whole. This includes working collaboratively to ensure that we make optimum use of the staff and other resources available to the NAO.

Fair

2.9 Staff are responsible for ensuring that their work, and the way that they treat people, is fair and just at all times. This applies to their treatment of NAO colleagues, staff of the bodies they audit and anyone else with whom they come into contact during the course of their work or while representing the NAO.

2.10 Work should be planned and carried out, and our findings reported in an accurate, fair and balanced way. Staff should also be balanced and fair in exercising their powers of access to external bodies and private sector firms arising, for example, from inspection audits or the examination of contracted out work.

2.11 Staff should be ready to provide appropriate constructive feedback and support to advance the professional development of their colleagues. They have a responsibility for creating a working environment in which individuals' differences are respected and where their diverse qualities, experiences and contributions are valued.

3. Handling Data and Information

3.1 The NAO has access to substantial amounts of data to enable us to perform our statutory audit tasks and to support the effective internal administration of our business. We have a duty to respect this privileged access and to ensure that the information entrusted to us is safeguarded properly. Specific statutory responsibilities and security considerations apply and all staff must be familiar with these.

3.2 Staff should make themselves aware of their obligations under legislation governing official secrets, data protection, computer misuse, copyright protection, the retention of public records, and the common law. They are responsible for the security of the information that they use or manage, and must ensure that appropriate measures are taken to preserve its safe keeping, integrity and availability for use.

Personal data

3.3 The Data Protection Act 1998 imposes a number of statutory obligations on organisations who obtain personal data, and the implications for the NAO are set out in the document entitled '[NAO responsibilities under the Data Protection Act](#)'. The [Data Protection Framework](#) and the related [Statement on the Management of Personal Data](#) provide guidance on the best way to request, process, store and destroy personal data.

3.4 The [Data Protection Framework](#) considers both the sensitivity and the volume of the data we hold and the roles and relevant responsibilities of staff in requesting and subsequently managing data. It applies equally to data held by us and to data processed by contractors on our behalf.

3.5 All staff must make themselves familiar with NAO policies related to the security of personal data and take all reasonable steps to ensure the Office operates the highest standards of compliance with the Data Protection Act in relation to requesting, accessing, storing, transferring and destroying personal data, including that held in both electronic and physical formats.

Official Secrets Act

3.6 The Official Secrets Acts 1911 and 1989 prohibit non-executives, employees, NAO contractors and employment agency staff from disclosing to any unauthorised person, either orally or in writing, certain categories of information (security and intelligence, defence, international relations, foreign confidences, crime and special investigation powers) acquired through their official duties, unless they have received official permission. The Acts apply during and after a person is employed at the NAO or carries out work on behalf of the NAO.

Information Security

3.7 The NAO is a member of the Government Secure internet (GSI). As such all staff must use the GSI in a way that protects the GSI infrastructure, the information it carries and the organisations connected to it. Any infringement could invalidate the Office's GSI accreditation. All staff must make themselves familiar with NAO security policies as set out in the [NAO Security Manual](#) and abide by them. All staff who suspect, observe or discover breaches of the information security policy must report the incident to the ITRC Service Desk (e-mail to [Z3 - ITRC Service Desk](#) or telephone ext 7272).

Unauthorised disclosures

3.8 The C&AG shall be the final arbiter about what shall, or shall not, be disclosed about the work of the NAO. Should staff become aware of the unauthorised disclosure of information damaging to the interests of the NAO, including the leaking of draft reports, they should report these matters to the Board Member responsible for Corporate Governance and Affairs, Gaby Cohen.

Freedom of Information

3.9 Subject to the foregoing requirements, the Office applies the prescription of openness in the Freedom of Information Act 2000. The Act itself provides for exceptions in respect of such matters as national security and data protection; and there is a specific exemption for audit bodies, though subject to a public interest test. To maintain consistency, and compliance with both the letter and the spirit of these complex provisions, no release of information under the Act should be made without the recorded agreement of the Board Member responsible for Corporate Governance and Affairs who will also take responsibility for conveying whatever is released to the requester of the information. Staff should familiarise themselves with the [FOI Essentials - the things you need to know](#), on Merlin.

4. Political Activities

4.1 The C&AG is an officer of the House of Commons and is independent of the Executive. Given the status of the C&AG and the role of the NAO, it is essential that the Office is, and is seen to be, free from political bias. The work of the Office impacts on a wide range of national and local issues, which frequently attract attention in the public and political arenas. Ill-considered or irresponsible comments or actions of a political nature could cause irreparable damage to the credibility of the C&AG and the Office.

4.2 It is crucial therefore, that staff avoid any activity which might bring into question the impartiality of the C&AG, the Office, or its employees. The aim of these rules is to allow NAO staff the freedom to participate in public affairs, without prejudicing the impartiality of the Office; they are not intended to place restrictions on privately held beliefs and opinions.

4.3 In order to protect the impartiality and independence of the Office, both perceived and real, it is necessary to restrict the extent to which staff can participate in national and local political activities. Full details of these restrictions are set out below:

Political activities which may be subject to restriction include:

- a) candidature for, or co-option to, local authorities or candidature for Parliament or the European Parliament. Under the House of Commons Disqualification Act, 1975, as amended by Schedule 2 Section 3(i) 'Parliamentary Disqualification' of the National Audit Act, 1983, NAO staff cannot become MPs.
- b) holding in party political organisations, offices which impinge wholly or mainly on party politics in the field of local government, Parliament or the European Parliament.
- c) speaking in public on matters of local or national political controversy.
- d) expressing views on such matters in letters to the press, or in books, articles or leaflets, or in any other media that is in the public domain.
- e) canvassing on behalf of candidates for local authorities, Parliament or the European Parliament or on behalf of a political party.

Staff are permitted to undertake political activities as follows:

- a) staff in the grade of Audit Manager/Band 1 and above may not engage in national political activities of any nature. They may engage in local political activities, but only with the express written permission of the Director of Human Resources, John McCann.

b) staff below the grade of Audit Manager/Band 1 may be permitted to engage in national and local political activities, but only with the express written permission of the Director of Human Resources.

c) staff who are permitted to take part in politics must observe the Official Secrets Acts, 1911 and 1989, and are barred from political activity while on duty or on official premises.

4.4 In seeking written permission from the Director of Human Resources, staff should give precise details of the intended activities and the period over which the activity is likely to take place. This information will assist the Director of Human Resources, in determining whether the impartiality of the Office might be compromised.

4.5 If any conflict of interest or potential damage to the interest of the NAO arises from staff involvement in approved political activities, they will be required to withdraw their participation. Failure to do so may result in the Director of Human Resources, applying formal disciplinary procedures or other appropriate action.

4.6 When political activity has been sanctioned, this should not take place in official time. Nor should staff make any reference to their employment by the National Audit Office when speaking in public, except in situations where they are required by legislation to declare an interest.

4.7 These measures are not intended to discourage staff from participating in such public service activities as school governorships, approved Non-Executive Directorships, or taking part in Trade Union work. The touchstone in these areas, as in all other activities, is that staff should avoid any possibility that their activities might embarrass the C&AG or call into question the impartiality of the NAO. If staff have any doubts they should consult the Director of Human Resources.

5. Conflicts of Interest

General

5.1 Those working in the public sector will from time to time find that private matters will impinge on their public duties. It is, of course, not appropriate for an individual to use his/her public position or resources to deal with private matters or to pursue private interests. Staff should declare any private interests relating to their public duties and take steps to resolve any conflicts arising, in a way which protects the public interest. Staff concerned about compliance issues should consult the Director of Human Resources, John McCann, if they require additional guidance.

5.2 In the course of their work it is essential that staff avoid any suggestion of nepotism or favouritism in their dealings with colleagues, clients or other contacts. This applies to the whole range of work activities, but the key areas are recruitment, tenders, contracts and staff appraisal. In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, choices should be based purely on merit.

5.3 Conflicts or potential conflicts of interest can, and do, arise in our work. The main areas are likely to be:

Private occupations

5.4 Staff must not carry out any work which might conflict with the interests of the NAO or be inconsistent with their position

5.5 Specifically, staff may not, subject to certain exceptions to be agreed by the Director of Human Resources, take part in any outside activity which would require their attendance during their normal office hours. (The exceptions might include, for example, service as a Justice of the Peace, school governorships, or approved Non-Executive Directorships). Further guidance is set out below but if staff are in any doubt they should seek approval from the Director, Human Resources, in advance of beginning the work.

5.6 Staff should consult the Director of Human Resources, if they are offered payment for work which relates to their official duties, or is carried out in official time. Any fee or payment for private work must be surrendered to the Office if the preparation or execution of the work is undertaken in official time, as should any fees for speeches or lectures given in an official capacity. Any travel, accommodation or meals provided in connection with such events must be reasonable in the circumstances.

5.7 Staff are permitted to write or contribute to books or articles that are not related to the work of the NAO. Their content must not call into question the integrity, objectivity or impartiality of the Office or the C&AG. Such activities should be conducted entirely in the individual's own time and staff should make no reference to their employment by the NAO. Any fee or payment for such work can be retained by the individual, but

must be notified in writing to the Director of Human Resources.

5.8 Staff are permitted to write or contribute to books or articles related to the work of the NAO provided that this is discussed and agreed with their line manager and the Board Member responsible for Corporate Governance and Affairs, Gaby Cohen. If approved, this discussion should include whether any fee payable for the work may be retained by the member of staff. The payment can normally be retained as long as staff can show that the work has not been undertaken during official hours.

5.9 Where staff, their immediate or close family members, or others with whom they have a close personal relationship have business relations, including making a loan or guaranteeing borrowing, with an audited entity these must be declared, except where they:

- a) involve the purchase of goods and services from the audit firm or the audited entity in the ordinary course of business and on an arm's length basis and which are not material to either party; or
- b) are clearly inconsequential to either party.

Similarly staff should also make a declaration where they, their immediate or close family members, or others with whom they have a close personal relationship have any relationships with employees of bodies they audit which might impinge on their responsibilities and duties as auditors. Declarations should be made to the Project Director who will take appropriate actions. Declarations by Project Directors should be made to the Director of Human Resources in his capacity as the NAO's Corporate Compliance Officer.

5.10 No restriction is placed on paid part time employment or other paid activities outside official hours provided that official work does not suffer and there is no risk of it bringing discredit upon the Office. However, staff proposing to undertake outside employment should obtain the consent of the Director of Human Resources if it:

- a) Is employment or activity as an auditor, accountant or book-keeper;
- b) Involves the use of official information acquired in the course of official duties;
- c) Is employment, or activity, for any body to which the NAO may award business or contracts;
- d) The working hours of the proposed employment, when aggregated with the working hours of NAO employment, are likely to exceed 48 hours per week.

5.11 Staff are personally responsible for any payments due to HMRC as a result of private occupations.

Shareholdings

5.12 Staff may hold private investments. However, neither they, nor their immediate family members (spouses and dependants) should hold or deal in shares when they are in a position to gain information through their position with the NAO which might affect the value of such shares. If staff hold shares which might raise a question of

possible conflict with the interests or independence of the NAO they should declare the holding immediately to the relevant Project Director. Examples of where conflicts exist are when an individual:

- knows of a large government contract to be placed with a public company
- has privileged information about a future privatisation
- knows of planned actions which might affect a company's prospects
- has shares in a privatised company and audits that company or the regulator

5.13 The Project Director will decide whether the individual's financial interest in a company might exert undue influence on his/her judgement, and, in conjunction with the Director of Human Resources, will determine the appropriate course of action. A record of this decision must be kept by Human Resources.

5.14 Staff are reminded of their legal responsibilities under the Criminal Justice Act 1993 which states that "An individual who has information as an insider is guilty of insider dealing if he/she deals in securities that are price-affected securities in relation to the information". Further, the Financial Services and Markets Act 2000 provides that the misuse of inside information and market manipulation are criminal offences. The misuse of any information that may affect the value of shares or dealings in shares at certain times may, therefore, be a criminal act.

Relationships with contractors

5.15 Contracts must be awarded on merit in fair competition against other potential suppliers (see [Finance Manual Section G - General Principles of Procurement of Goods and Services](#)). Staff who have any personal or domestic relationship with potential suppliers must report the fact to the Director of Human Resources and must not have any involvement in the letting of contracts for which such suppliers might bid.

5.16 Staff must declare any investment interests they hold with suppliers or consultants with whom they might deal. Where conflict might arise the individual should dispose of his/her investment or ensure that he/she plays no part in awarding the contract or selecting consultants.

5.17 When dealing with suppliers and consultants staff should be aware of the implications of the Bribery Act 2010 as set out in [PC 01/11](#).

Future Employment and Secondments

5.18 All staff are required to notify both their manager and the Director of Human Resources of any potential employment with an audited body.

5.19 Where staff have given such notice action will be taken to negate any potential conflict of interest. This may involve removing them from the audit team and reviewing any work performed by the individual in the current and, where appropriate, most recent audit.

5.20 All secondment opportunities which may lead to a potential conflict of interest or impact on an individual's ability to carry out their audit duties on their return to the NAO will be approved by the Director General of Financial Audit, Maggie McGhee. Any restrictions on work undertaken either while on secondment or on return to the NAO will be clearly documented before a placement is agreed.

6. Gifts, Hospitality, Travel and Accommodation

General

6.1 The NAO engages with a wide variety of clients, suppliers and partner bodies in the normal course of its business and staff may be faced with occasions where gifts or hospitality are offered or provided. Offers of gifts, hospitality, entertainment or services should not be accepted where they might place, or be seen to place, the recipient under an obligation to the donor or compromise their personal or professional judgement.

6.2 The Bribery Act 2010 aims to promote anti-bribery practices among businesses and repeals the Prevention of Corruption Act 1916. The Act defines bribery as: offering (promising) or receiving (requesting) a bribe in return for breach of expectation or improper performance and sets out four criminal offences, namely: bribing another person; being bribed; bribery of a foreign public official; and failure of a commercial organisation to prevent (a bribe). The new legislation raises the maximum penalty for bribery by individuals from seven to ten years' imprisonment and further guidance is provided in [PC 01/11](#).

Gifts

6.3 Staff may accept gifts in the form of: business items of token value (for example, placemats or calendars); items provided at conferences or related events (for example, pens and wallets), and occasional tokens of thanks/appreciation (for example inexpensive chocolates or single bottles of wine). These items need not be recorded. All other gifts received by staff, or by their immediate family members, may not be accepted, but their receipt must be recorded in the Office's Gifts & Hospitality Register ([using the form available from the HR pages on Merlin](#)) and either returned to the donor organisation or, if return is not practical or might cause offence, surrendered to the Director of Human Resources, John McCann, who will arrange for the item to be donated for charitable purposes.

Hospitality

6.4 Staff are permitted to accept hospitality which is provided in the normal course of business and could reasonably be reciprocated by the NAO. This includes working lunches or dinners, providing these cover a business agenda. The standard of hospitality should be no more than that which might reasonably be offered by the NAO in return. All working lunches or dinners provided off client premises must be recorded on the [gifts and hospitality register](#).

6.5 A key principle of accepting such hospitality is that there should be a balance of hospitality received and hospitality given. Staff should, therefore, be careful not to accept hospitality where an appropriate balance is not maintained.

6.6 Staff may also accept invitations to events where they are representing the NAO in an official or professional capacity. This includes invitations to business dinners and events such as awards ceremonies where the NAO has been nominated for an award, is judging an award or is acting as a sponsor. In considering whether an invitation should be accepted account should be taken of the level of attendance of NAO colleagues to ensure that their attendance is reasonable in the circumstances. Events which include some form of entertainment can be accepted providing the entertainment forms an intrinsic part of the event. Attendance at all such dinners, ceremonies or events must be recorded on the [gifts and hospitality register](#).

6.7 Staff must not accept any invitation to any event or offer of corporate hospitality where attendance would normally be subject to payment of a fee. This includes invitations to art exhibitions, sporting or cultural events, charity dinners and hotel accommodation.

Travel and Accommodation

6.8 Staff have a responsibility to ensure that any travel or accommodation for business purposes is reasonable in the circumstances and would not expose the individual or the NAO to public criticism. Full details of the rules relating to travel and subsistence are contained in the Office's [Travel Guide](#). Other than in specific defined circumstances all travel and accommodation bookings must be made through the Office's travel management company.

6.9 Staff and their line managers will be responsible for judging the travel and accommodation appropriate to the particular business need, but should be mindful at all times of the need to balance issues such as safety and security with economy. All staff are expected to travel standard class. Any variation to this requires the prior approval of the Director responsible for the job and must meet the strict criteria set out in the [NAO Travel Guide](#). Standards of accommodation should likewise be adequate for the purpose and appear reasonable to an informed external commentator.

6.10 Any benefits earned through NAO business travel, such as air miles must only be used to reduce the costs of future business travel and must not be used for private purposes.

6.11. Where staff accept travel and accommodation arranged by their hosts (for example international bodies) they should review the itinerary in advance to ensure that the standards offered are compatible with NAO standards. Where the itinerary indicates that the standard offered is significantly different to that appropriate under NAO rules and there is a suitable alternative, staff should consider declining the offer and making their own arrangements.

6.12 Subject to considerations of practicability and security, the Office places no restrictions on the freedom of staff to be accompanied by partners at their own expense providing no extra cost falls to the Office. The Office does not, however, recognise any representational or other reason for partner-accompanied travel at

public expense, and it accepts no liability for loss or damage suffered by any accompanying persons not required for NAO business, unless such liabilities have been explicitly accepted (for example, where there is a long term residential commitment). Partners travel entirely at their own risk.

6.13 Staff must obtain prior approval from their project Director (or AAG/Chief Operating Officer for Directors and AAGs) for all international travel and associated work programmes. Managers should be informed of all the relevant details of a trip before it is approved, including if the member of staff will be accompanied by their partner or if there are plans to extend the trip beyond the time necessary for the visit's purpose. Managers should have regard to this information, as to the destination, duration and intensity of the proposed programme, in assessing the business case and motivation for the proposed travel. The overriding need is to protect the good name of the Office; and a key test of decisions by authorising managers will be that criticism of the Office is avoided or, if it occurs, can in the judgement of the Audit Committee, be effectively rebutted. Staff, and the managers of staff undertaking work overseas need to comply with the policy on safeguarding staff overseas as set out in [MC05/12](#).

7. Personal Conduct

General

7.1 Staff should always maintain the highest standards of personal conduct. The Office is concerned only with the private and personal activities of staff which impinge on the performance of their duties or risk bringing discredit to the Office. Particular difficulties may arise in the following areas, either in the course of undertaking official duties or outside the Office:

- a) staff should not participate in activities which might severely damage their financial standing. Staff who become bankrupt or insolvent, or who experience significant financial difficulties, must immediately report the fact to the Director of Human Resources, John McCann. They will be required to give a full statement of their case to establish whether their position is likely to prejudice the proper and effective performance of their duties.
- b) staff should adopt high standards of personal discipline, and avoid any forms of over-indulgence or addiction, which may adversely affect their conduct or impair the performance of their official duties.
- c) staff should discuss with their immediate manager or senior manager any personal or domestic relationships with NAO colleagues where that relationship may impinge on their duties and responsibilities to ensure that the allocation or routing of work avoids potential conflicts. A record of the discussion and resulting decision must be sent to the Director of Human Resources.
- d) staff should not make use of their official position to further their private interests.
- e) staff should inform the Director of Human Resources in the event that they are or ever have been refused or restricted in the right to carry on any trade, business or profession for which a specific licence, registration or other authority is required. Staff subject to a court order instigated by a regulatory body, or subject to official enquiry by a financial, professional or other business authority should also disclose it.
- f) staff should report the results of any disciplinary procedures or reprimands issued by professional bodies. Staff investigated by their institute for allegations of misconduct or malpractice should also make the existence of these investigations known to the Director of Human Resources.
- g) staff must make no public comment about the National Audit Office or its work without prior approval from the Board Member responsible for Corporate Governance and Affairs, Gaby Cohen.
- h) staff have a personal responsibility to ensure that they comply with HMRC rules and that their tax affairs are up to date.

Reporting of arrests or convictions or court judgements

7.2 Staff must inform the Director of Human Resources if they are arrested and refused bail, or if they are convicted by a court of any criminal offence (except a traffic offence with a non-official vehicle, for which the penalty does not include imprisonment or disqualification from driving). Staff are also obliged to report any civil actions they are subject to as a result of professional or business activities where a court has found against them.

7.3 Staff should also inform the Director of Human Resources if they are subject to: a judgement by a UK court about a debt (including Child Support Agency orders and non-payment of Council Tax); an attachment of earnings order; if they are declared bankrupt or served with a bankruptcy petition; or if they enter into compromise arrangements or trust deeds with creditors.

Use and control of public funds and assets

7.4 Staff should use public assets efficiently and effectively for legitimate business purposes. This applies to the use of all Office equipment including, for example, telephones, computers and photocopiers, although occasional use of such facilities for private purposes is permissible where the costs are trivial. In addition, staff must comply with Office rules regarding expense claims, imprests and the recording of absence.

Prevention of fraud

7.5 All staff have a personal responsibility for handling public assets with probity. They also have a responsibility for reporting immediately to their line manager, or other appropriate person, any suspected fraud by their colleagues, contractors or suppliers.

Employee relations

7.6 The NAO is subject to UK and European employment legislation, and it aims to comply with the spirit as well as the letter of relevant Acts and Directives. Staff should, therefore, be aware of their responsibilities in the following areas:

a) Discrimination: Staff should not discriminate unfairly on the grounds of ethnic or racial origin, disability, religion, age, sexual orientation, gender, pregnancy or maternity, part time/ full time status, marital status or trade union activities.

b) Harassment: Harassment may take many forms, including victimisation, bullying, and physical or verbal abuse as well as less obvious actions such as ignoring a colleague, showing unwanted attention or making inappropriate personal remarks. It may occur in the Office, or, when work takes staff away from home, outside normal working hours. All forms of harassment are unacceptable and will not be tolerated in the NAO.

c) Health & Safety: [The Office's Health and Safety Policy](#) makes clear that all staff have a personal responsibility, so far as is reasonably practical, both for their own health and safety at work and for ensuring that they and their colleagues do not put

the health and safety of others at risk. In completing the [Code of Conduct return](#), staff are confirming that they have read and understood the [NAO's Health and Safety Policy](#), including the advice on display screen equipment and manual handling, and the [ITRC Remote Working Reference Guide](#) and agree to abide by these its provisions.