

Part E2: Employee Code of Conduct

1.0 INTRODUCTION

- 1.1 The Code of Conduct is intended to lay down guidelines that will help maintain and improve standards and protect employees from misunderstanding or criticism. If an employee thinks they may breach the Code they should seek guidance from their line manager or the Head of Paid Service or the Monitoring Officer at the earliest opportunity. The over-riding principle is if in doubt, ask. Instances where the Code is broken will be investigated and appropriate action taken. This need not involve the use of the Council's Disciplinary Procedure and will depend on the individual circumstances of the case.

2.0 STANDARDS

- 2.1 Local Government employees are expected to give the highest possible standard of service and conduct to the public, Councillors and fellow employees. Employees will be expected, without fear of recrimination, to bring to the attention of their Manager any deficiency in the provision of service. Employees must report any impropriety or breach of procedure to the Head of Paid Service.
- 2.2 Employees are expected to dress in a manner likely to inspire the confidence and trust of the public. Some forms of clothing, such as shorts or jeans, are unacceptable and the general principle is one of common sense. Employees who do not dress appropriately may damage the Council's image.
- 2.3 The Council and its employees are mutually interested in efficient and economical services to the public. It is therefore important that office procedures are properly carried out with legible and tidy records maintained.

3.0 DISCLOSURE OF INFORMATION

- 3.1 It is generally accepted that open government is best. The law requires that certain types of information must be available to Members, auditors, government departments, service users and the public. The Council itself may decide to be open about other types of information. Employees must be aware of which information the Council is and is not open about, and act accordingly.
- 3.2 Employees must not use any information obtained in the course of their employment for personal gain or benefit, nor must they pass it on to others who might use it in such a way. Any particular information received by an employee from a Councillor that is personal to that Councillor and does not belong to the Council should not be divulged by the employee without the prior approval of that Councillor, except where such disclosure is required or sanctioned by the law.
- 3.3 Client or customer confidentiality is of the utmost importance and must be maintained at all times by every employee. Even small indiscretions can lead to aggrieved feelings.

3.4 When employees are asked by the public or an organisation to recommend a supplier or contractor they should refer them to the approved list published by the relevant professional bodies or associations. If one does not exist then the enquirer should be informed that it is Council policy not to make specific recommendations.

4.0 POLITICAL NEUTRALITY

4.1 Employees serve the Council as a whole. It follows they must serve all Councillors and not just those of the controlling group or of a specific committee, and must ensure that the individual rights of all Councillors are respected.

4.2 Subject to the Council's conventions, employees may also be required to advise political groups. They must do so in ways that do not compromise their political neutrality.

4.3 Employees, whether or not politically restricted, must follow every lawful expressed policy of the Council and must not allow their own personal or political opinions to interfere with their work.

5.0 RELATIONSHIPS

5.1 Councillors

5.1.1 Employees are responsible to the Council through its senior managers. For some, their role is to give advice to Councillors and senior managers and all are there to carry out the Council's work. Mutual respect between employees and Councillors is essential to good local government. Close personal familiarity between employees and individual Councillors can damage the relationship and prove embarrassing to other employees and Councillors and should therefore be avoided.

5.1.2 The address that should be used when talking to Councillors is Councillor Smith/Jones/Brown.

5.1.3 Priority should be given to a Councillor's request for information unless this will have a significant effect on the employee's workload, in which case Managers should be informed.

5.2 The local community and service users

Employees should always remember their responsibilities to the community they serve and ensure courteous, efficient and impartial service delivery to all groups and individuals within that community as defined by the policies of the Council.

5.3 Contractors

- 5.3.1 All relationships of a business or private nature between employees and external contractors, or potential contractors, should be disclosed in writing to the Head of Paid Service. Orders and contracts must be awarded on merit, by fair competition against other tenders in accordance with the Council's Contract Rules and Financial Rules, and no special favour should be shown to businesses run by, for example, friends, partners or relatives in the tendering process. No part of the local community should be discriminated against.
- 5.3.2 Employees who engage or supervise contractors or have any other official relationship with contractors and have previously had or currently have a relationship in a private or domestic capacity with contractors, should declare that relationship in writing to the Head of Paid Service.

6.0 APPOINTMENTS AND OTHER EMPLOYMENT MATTERS

- 6.1 Employees involved in appointments should ensure that these are made on the basis of merit. It would be unlawful for an employee to make an appointment based on anything other than the ability of the candidate to undertake the duties of the post. In order to avoid any possible accusation of bias, employees should not be involved in an appointment where they are related to an applicant, or have a close personal relationship outside work with him/her/them.
- 6.2 Similarly, employees should not be involved in decisions relating to discipline, promotion or pay adjustments for any other employee who is a relative, partner, etc.

7.0 OUTSIDE COMMITMENTS/OTHER EMPLOYMENT

- 7.1 No employee of the Council should undertake outside work if their official duties overlap in some way with their proposed work, if it causes a conflict of interest, or if it makes use of material to which the employee has access by virtue of his or her position. It is irrelevant whether or not the work is paid. It is not always obvious that a conflict may arise and securing permission first gives the employee protection against future criticism.
- 7.2 To ensure nothing conflicts with the employee's role prior consent must be sought in all cases. The employee must apply to their Manager using a Request to engage in work outside duties in Cotswold District Council form for permission to undertake other employment or outside commitment. These requests can normally be dealt with in a few working days.
- 7.3 The Council is committed to encouraging employees to play a full part in the community and this provision is not intended to discourage people from taking up appointments with voluntary bodies, as a school governor, etc.
- 7.4 Where employees wish to engage in work outside their official duties, then the following procedure must be adhered to:

- a. No private work shall take place on Council premises, or within normal contracted working hours, or using Council-owned equipment, supplies or other assets.
- b. The Council shall bear no costs arising from private work.
- c. All private work should be done within the Employee Code of Conduct with particular reference to:
 - i. Outside commitments/other employment
 - ii. Patentable designs and publications
 - iii. Personal interests
 - iv. Separation of roles during tendering
 - v. Corruption
 - vi. Gifts and hospitality
- d. The Council recommends that employees do not work in excess of 48 hours in any one-week period, including all hours worked for the Council and any private work (whether paid or unpaid). The employee must also observe the other conditions of the Working Time Regulations, such as a daily rest period of 11 consecutive hours between shifts, and an uninterrupted weekly rest period of not less than 24 hours.
- e. Private work from clients who have business interests within the District, where this may cause a conflict of interest, may only be accepted with the permission of the Head of Paid Service. Consideration needs to be given to clients outside the District who may nonetheless have business interests within the District, where a conflict of interest may arise. When any new business from a new client is contemplated, the permission of the Head of Paid Service must be obtained, and copied to the Manager.
- f. The employee is expected to adhere to any professional codes of conduct that might apply.
- g. A written declaration of potential interest shall be submitted to the Head of Paid Service for approval and copied to the Manager for subsequent inclusion on the individual's personnel file, for each new piece of work offered by any client, which outlines:
 - i. Name and address of client
 - ii. Brief description of work to be undertaken
 - iii. Potential conflicts of interest or other risks to CDC and mitigating measures in place
 - iv. Hours to be worked per week
 - v. Duration of project or other timetable information

- vi Statement of business interests in the District that the client may have that could lead to a conflict of interest.
 - h. Once the declaration of interest has been approved by the Head of Paid Service it should be put on file with:
 - i. the Manager
 - ii. the employee's personnel file
 - i. If the declaration of potential interest is not approved, the employee may not accept the private work in question while employed by the Council.
- 7.5 Failure to comply with this protocol may lead to disciplinary action under the Council's policy up to and including dismissal.

8.0 PATENTABLE DESIGNS, INVENTIONS AND PUBLICATIONS

- 8.1 Any Council employee who proposes to take out a patent for an invention shall, after obtaining provisional protection, send particulars thereof to the Head of Paid Service for submission to the Cabinet before taking any further steps.
- 8.2 Where the Cabinet is of the opinion that the invention is connected with the official work performed at any time by the officer concerned, permission to take out a patent will, if granted, be subject to such conditions as to its use as may be imposed, which shall include the right of the Council to use the patent for all time without the payment of any fees or royalties whatsoever but may provide for the payment of a grant, honorarium, or other monetary reward to the officer concerned. Intellectual property gained as a result of employment remains the property of the Council.
- 8.3 Where, on the other hand, the Cabinet is of the opinion that the invention is in no way connected with the official work performed at any time by the officer concerned, no restrictions will be imposed by the Council.
- 8.4 Patents should not be taken out by Council employees whose duty it is to devise improvements or to examine and report upon the suggestions of others.
- 8.5 If an Officer is considering writing or contributing to a publication which is in any way connected with their professional duties or another aspect of their employment with the Council they must, first of all, seek permission from the Head of Paid Service. This is to avoid unauthorised use of Council resources, the opinion of an individual being interpreted as that of the Council or an individual criticising the Council, its Members or Officers.
- 8.6 Permission must always be sought were an employee can be identified with the article, correspondence or publication.

9.0 PERSONAL INTERESTS

- 9.1 Employees must declare to the Head of Paid Service any financial or non-financial interests that they consider could bring about conflict with the Council's interests.
- 9.2 Employees should declare to the Head of Paid Service membership of any organisation not open to the public without formal membership and commitment of allegiance and which has secrecy about rules or membership or conduct.

10.0 EQUALITY ISSUES

- 10.1 All employees should ensure that the Council's Comprehensive Equality Policy is complied with in addition to the requirements of the law. All members of the local community, customers and other employees have a right to be treated with fairness and equity.

11.0 SEPARATION OF ROLES DURING TENDERING

- 11.1 Employees involved in the tendering process and dealing with contractors should be clear on the separation of client and contractor roles within the Council. Employees who have both a client and contractor responsibility must be aware of the need for accountability and openness.
- 11.2 Employees in contractor or client units must exercise fairness and impartiality when dealing with all customers, suppliers, other contractors and sub-contractors.
- 11.3 Employees who are privy to confidential information on tenders or costs for either internal or external contractors should not disclose that information to any unauthorised party or organisation.
- 11.4 Employees contemplating a management buyout should, as soon as they have formed a definite intent, inform the Head of Paid Service and withdraw from the contract awarding processes.
- 11.5 Employees should ensure that no special favour is shown to current or recent former employees or their partners, close relatives or associates by employing them in a senior or relevant managerial capacity.

12.0 CORRUPTION

- 12.1 Employees should not use their authority or office for personal gain and should maintain unimpeachable standards of integrity in their business relationships both inside and outside the Council.
- 12.2 Employees must be aware that it is a serious criminal offence for them corruptly to receive or give any gift, loan, fee, reward or advantage for doing or not doing anything or showing favour or disfavour to any person in their official capacity. If an allegation is made it is for the employee to demonstrate that any such reward has not been corruptly obtained.

12.3 It is also an offence to receive any payment or reward other than proper remuneration.

13.0 USE OF FINANCIAL RESOURCES

13.1 Employees must ensure that they use public funds entrusted to them in a responsible and lawful manner. They should strive to ensure value for money to the local community and to avoid challenge to the Council.

13.2 Ordering and purchasing

13.2.1 Employees responsible for ordering goods and services should take account of the following regulations:

13.3 Financial Rules and Contract Rules

13.3.1 These Rules are contained within the Council's Constitution (available on the website), and the Chief Finance Officer and the Monitoring Officer have copies of the relevant documents.

14.0 GIFTS AND HOSPITALITY

14.1 Employees should only accept offers of gifts or hospitality if the following criteria have been satisfied:

- a. There is a genuine need to impart or gain information or to represent the Council in the community.
- b. The gift or hospitality has been properly approved and recorded.
- c. It is clear that the gift or hospitality does not compromise the employee's or the Council's position regarding future, current or past contracts or decisions. Employees should be particularly sensitive to the timing of offers of gifts or hospitality in relation to decisions that the Council may have taken, or be about to take, which affect those providing the gift or hospitality.
- d. The value of the gift or hospitality is not excessive. The guiding principle should be that the gift or hospitality should not be at a higher level than that which would be reciprocated by the Council.

14.2 The Head of Paid Service may approve gifts and hospitality that are clearly within the guidelines set out below. If there is any doubt, the officer should seek advice before accepting any gift. All gifts and hospitality should be notified to the Head of Paid Service - a Register of Gifts and Hospitality is maintained. The Register will be reviewed annually and reported to the Cabinet.

14.3 Where gifts or invitations are refused, the officer should ensure that there is a sufficient record on their files to clearly demonstrate this.

14.4 Examples of gifts and hospitality are set out below, together with guidance on whether or not they should be accepted.

14.5 Conferences

14.5.1 Reasonable hospitality through attendance at relevant conferences, courses, seminars, user groups and meetings is acceptable where it is clear that the hospitality is corporate rather than personal, where approval is given and recorded in the Register in advance and where the Head of Paid Service is satisfied that purchasing or other decisions are not compromised.

14.5.2 Fees, gifts or hospitality received by employees contributing to conferences, seminars, etc, should be approved by the Head of Paid Service and recorded in the Register.

14.6 Exhibitions

14.6.1 Trade exhibitions tickets received free of charge should be used only if the officer's attendance is considered of benefit to the Council. The attendance should be authorised by the Head of Paid Service and recorded in the Register.

14.7 Meals

14.7.1 Where there is an on-going working relationship between the employee and an outside organisation or person and the relationship occasionally involves hospitality such as working lunches, the employee should ensure that expenses are shared equally and are not excessive. Modest bar meals may be acceptable but lunch at expensive venues may not. All such hospitality should be authorised by the Head of Paid Service and recorded in the Register.

14.8 Travel

14.8.1 Free or discounted transport or holidays should not be accepted unless the offer is of a corporate nature open to all officers of the Council and approved by the Head of Paid Service.

14.9 Visits to suppliers

14.9.1 Where visits to inspect equipment or products are required, employees should ensure that the Council meets the cost of such visits to avoid jeopardising the integrity of subsequent purchasing decisions. Hospitality, over and above light refreshments, should not be accepted from suppliers or prospective suppliers.

14.10 Gifts

14.10.1 Employees should not accept significant personal gifts from contractors, suppliers or anyone who may be affected by decisions made by the Council. Significant gifts include money, vouchers, and bottles of wine or spirits. While it is sometimes difficult to refuse gifts, they should be politely but firmly declined. Gifts from the general public should be treated similarly. When it is impossible to refuse a significant gift it should be passed to the Head of Paid Service who will forward it to a local charity.

14.10.2 Insignificant gifts such as those listed below may be accepted without the need for authority and recording but officers should be aware that they are responsible for determining whether a gift should be accepted and may be called to justify their decision. Insignificant gifts may include small promotional items such as diaries, calendars, pens, mugs, coasters, scrap pads and paperweights. If in doubt, seek authority and record it.

14.11 Sporting and social events

14.11.1 Sporting and social functions should only be accepted if they are part of the life of the Cotswold community and/or where the Council should be seen to be represented. They should be authorised by the Head of Paid Service and recorded in the Register. Examples include school sports days or competitions involving local teams, representative gatherings of community interest groups, meetings of public organisations and events organised to celebrate achievement affecting the Cotswolds.

14.11.2 Invitations to major sporting and social events such as international or national sporting fixtures, golf days, go-karting events, theatre visits, social gatherings or meals as the guest of a supplier, prospective supplier, or other commercial body should be declined.

14.12 Visits

14.12.1 Visits abroad for whatever purpose should only be accepted if they are funded by the Council, approved by the Head of Paid Service and recorded in the Register in advance.

15.0 SPONSORSHIP - GIVING AND RECEIVING

15.1 Where an outside organisation wishes to sponsor or is seeking to sponsor a Council or employee activity, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts or hospitality apply. Particular care should be taken when dealing with contractors or potential contractors. In any event, sponsorship should be in a form readily identifiable as a contribution from the sponsor separate from any contractual arrangements. Sponsorship received should be approved by the Head of Paid Service and recorded in the Register.

15.2 Where the Council wishes to sponsor an event or service neither an employee nor any partner, spouse or relative must benefit from the sponsorship in a direct way without there being full disclosure to the Head of Paid Service of any such interest. Similarly, where the Council, through sponsorship, grant aid, financial or other means gives support in the community, employees should ensure that impartial advice is given and that there is no conflict of interest involved.

16.0 PLANNING APPLICATIONS BY STAFF AND FAMILY

16.1 If you or a close family member or business partner submit an application for Planning Permission, Listed Building Consent or similar to this Council then the fact that you are a member of staff must be openly declared in a covering letter to the Head of Development Services (or officer with such responsibilities).

16.2 This fact will be kept on the relevant application file and reported in the Planning Officer's Committee report (if the application is determined in that way). All applications and similar consents submitted by an Officer of the Council (or their partner, close relative or their partner's close relative) must be the subject of consultation with the Ward Member(s) and the Chair (Vice-Chair) of the Planning and Licensing Committee.

16.3 Whilst such applications do not have to be determined by the Committee, these additional requirements and safeguards have been introduced to ensure complete transparency - not to enable bias for or against a member of staff.

16.4 There is nothing to prevent you from making a representation for or against somebody else's planning application; however, the fact that you are a member of staff must also be included in a covering letter.

17.0 GRANT APPLICATIONS BY STAFF AND FAMILY

17.1 If you or a close family member or business partner submit an application for grant, either as an individual or acting as the main contractor or representative of a community group/organisation, national organisation or statutory body, you should clearly include details of your (or your families) employment with the Council as part of the information supplied with the grant application.

17.2 This fact will be reported to the relevant grants panel or committee responsible for determining the grant application.

18.0 DATA PROTECTION ACT/GENERAL DATA PROTECTION REGULATION

18.1 All Council computer systems, including personal computers, that hold personal information (i.e. any information from which an individual can be identified, name, address, etc) MUST be registered under the Data Protection Act/General Data Protection Regulation. It is important to note that the information need not be sensitive and that registration is mandatory, even where the Council has a statutory duty to hold the information.

- 18.2 Each registration of information held includes a specification of where the information may be collected from, what information is held, for what purpose and who may see it. Any proposed changes to working practices should therefore be considered as potentially requiring a change to the registration.
- 18.3 Staff have a duty under the act to ensure that information is collected fairly, is accurate, is only seen by people 'with a need to know' and not held longer than necessary. Information must only be used for the purpose(s) for which it is registered.
- 18.4 People have a right, on payment of a fee, to see information held about them and any request to see such information should be forwarded to the Council's Data Protection Officer, who co-ordinates such 'searches' on behalf of the Council.
- 18.5 Anyone requiring further information should contact the Council's Data Protection Officer.

19.0 COMPUTER VIRUSES AND GAMES

19.1 To help ensure no computer viruses are introduced into the Council's computer system, no unofficial or unlicensed software is to be used by employees on the Council's computer equipment under any circumstances.

19.2 You must:

- always virus check any disks or CD-ROMS that have been used outside the Council on the standalone machine provided in the IT office;
- never load any software onto a pc without checking it for viruses.

Computer games supplied as part of licensed software must not be played during office hours.

20.0 ENVIRONMENTAL ISSUES

20.1 The Council has an 'Environmental Strategy'. It outlines what we should all be doing to improve the quality of life for everyone who lives, works or visits the District. The following is taken from its introduction:

All employees are expected to follow the directions outlined by the strategy. The strategy is based on the Council's vision, which has four main aims. These define what is important for maintaining and enhancing our quality of life. They carry throughout the importance of focusing on the community, partnership and our interaction with the natural environment.

As such the whole strategy is an umbrella under which we will work in order to achieve our vision of a sustainable and environmentally sensitive future. The statements made in the strategy are deliberately broad so that every department of the Council, business, community, or individual can adopt part of the strategy in order to achieve an improvement in our quality of life.

20.2 If you would like a copy of the 'Environmental Strategy' or require further information, please contact Environmental Services.

21.0 TELEPHONES

21.1 Council Officers are expected to display common-sense with the telephone and should keep their telephone calls to a minimum and should only make calls when it is necessary.

21.2 Officers, in adopting a customer orientated approach, are encouraged to answer incoming calls within no more than four rings.

21.3 Telephone handsets have a number of facilities, including the call forwarding ability and this should be used whenever any extension is left unattended.

21.4 The Council's internal telephone directory lists departmentally members of staff, and Councillors on the abbreviated dialling system.

21.5 Payphones are not available at office locations so the Council operates an 'Honesty Box' system. This allows you to make calls from your office extension and these should be logged on the relevant form and paid on a monthly basis to the Finance Team. Private calls should be kept to an absolute minimum.

22.0 SECURITY PROCEDURES

22.1 Responsibility for Security

22.1.1 Whilst all staff have responsibility for aspects of office security, the Head of Paid Service is responsible for co-ordinating, implementing and monitoring security procedures at Trinity Road and Moreton Branch Office.

22.2 Access to the Building

22.2.1 As a firm rule, access to the building for members of staff and visitors is via Reception, the Council Chamber entrance and the two doors outside Printing (for staff only).

22.2.2 In certain cases it may be desirable to use fire doors to enable large, awkward or heavy loads to be carried in or out. Under these circumstances it is the responsibility of the member of staff who opens the door to ensure that security is maintained during and after use.

22.2.3 Every officer has a responsibility to ensure that windows and doors are closed and, where appropriate, secured at the end of the day. The cleaning staff will take note of any windows or doors left open when undertaking their evening duties and will report lapses in security to the Property Services Team and the Head of Paid Service.

22.3 Contractors

22.3.1 When contractors are engaged to carry out work outside normal working hours, the officer responsible for supervising the work will ensure that arrangements have been made, in conjunction with the Property Services Team, for access and supervision.

22.4 Council Chamber Suite

22.4.1 Access for Councillors and visitors to [meetings in] the Council Chamber and Committee Room will be via the external door of the Council Chamber Suite. Visitors will be directed to the external door by reception staff.

22.5 Entrance Door Keys (Outer Door)

22.5.1 The Property Services Team is responsible for the issue of keys to the outer door.

22.6 Interior Doors

- 22.6.1 Access doors from reception and public areas are fitted with security pads.
- 22.6.2 Staff and Councillors will be given their Access Control passes on their first day which will open all doors.
- 22.6.3 Access is controlled by a central system. Each member of staff is issued with a programmable card which gives them access to the appropriate areas during the times needed. The card also acts as an ID card and therefore you are required to wear it at all times you are in the building. Chains and clips are available.
- 22.6.4 You must not allow anyone who you are not certain is a member of staff into the secure areas of the building.
- 22.6.5 Lost cards must be reported to reception immediately so that they can be cancelled. Managers are responsible for ensuring that staff who are leaving return their card on their last day at work.

22.7 Visitors

- 22.7.1 All visitors to the Trinity Road offices will be directed to the main Reception.
- 22.7.2 If their visit requires them to have access to the 'secure' part of the building they must sign in at Reception and must wear a visitors badge.
- 22.7.3 Visitors must be collected from Reception, escorted while in the 'secure' area and returned to reception to be signed out and to return the visitors badge

22.8 Staff Vigilance

- 22.8.1 All staff are asked to be vigilant at all times.
- 22.8.2 Note any unusual occurrence and report any incident to a Manager at once. Lock personal items away to deter theft.

22.9 Panic Buttons

- 22.9.1 In some areas where staff deal with visitors face to face, their work station will be equipped with a button to summon emergency assistance.
- 22.9.2 The Manager has a responsibility to ensure that staff are trained in the operation of the system and that response is always available.
- 22.9.3 In cases of violence, always call for assistance at once.

- 22.9.4 Training is available for staff who may be faced with such an incident - Managers and Human Resources can supply details.

22.10 Opening Times

- 22.10.1 Access to the building for most staff is available between 7.00am and 7.00pm. Outside these times the intruder alarm will be active and all external doors deadlocked. If you need to work outside these hours then you must make a prior arrangement with the Property Services Team.

22.11 Alarm Systems

- 22.11.1 The Trinity Road offices are covered by an Intruder Alarm system.

- 22.11.2 The Intruder Alarm is fully active when the outer doors are locked and partially active when the outer doors are unlocked.

22.11.3 Alarm Response - IMPORTANT

- 22.11.3.1 Members of staff must not respond to any out of hours alarm call out. There are now no occasions when any member of staff will receive an official call-out to deal with an intruder alarm situation.

- 22.11.3.2 First response to all alarm signals rests with the intruder alarm company and the police.

- 22.11.3.3 Consequently, if any officer of the Council should receive a call at home with the message that the intruder alarm has signalled, **he or she must not respond by attending the site.**

22.11.4 Procedure

- 22.11.4.1 If you receive an alarm call-out at home, ask for the name and phone number of the caller.

- 22.11.4.2 Next, call the alarm pager service and leave a message including your own name and phone number in case the police wish to speak to you. You may receive a direct answer to this phone number or you may be asked to leave a message.

- 22.11.4.3 In any event, report the incident to your Manager or the Property Services Team on your return to work.

22.12 Video Surveillance

- 22.12.1 The main reception area at Trinity Road, together with all associated areas to which visitors have access, is covered 24 hours a day by recording video surveillance.

- 22.12.2 Information recorded includes date and time.

22.12.3 For your own safety it is important that you enter and leave the building via the main reception and through the video surveillance area.

23.0 DATA MATCHING

23.1 Under the National Fraud Initiative, the Council is required to provide payroll information for the purpose of data matching. This effectively means that the payroll will be checked against other databases in an effort to identify fraudulent benefit claims.

23.2 The Council has no choice in whether or not to provide the data although the Code of Practice requires that people are fully informed that the information will be used in this way. All information provided will be handled in accordance with the Data Protection Act.