



Commonwealth Scholarship Commission in the UK

COMMONWEALTH SCHOLARSHIP COMMISSION IN THE UNITED KINGDOM

Commission Code of Conduct

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1. INTRODUCTION

- 1.1. As a Commissioner, your behaviour and actions must be governed by the principles set out in this Code of Conduct. It is your responsibility to ensure that you are familiar with, and comply with, all the relevant provisions of the Code.

2. KEY PRINCIPLES OF PUBLIC LIFE

- 2.1. The key principles upon which this Code of Conduct is based are the Seven Principle of Public Life.¹ These are:

Selflessness

Holders of public office should act solely in terms of the public interest.

Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

Objectivity

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty

Holders of public office should be truthful.

Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

- 2.2. These principles should inform your actions and decisions as a member of the Commonwealth Scholarship Commission (CSC).

¹The 7 principles of public life <https://www.gov.uk/government/publications/the-7-principles-of-public-life>

3. GENERAL CONDUCT

Use of Public Funds²

- 3.1. You have a duty to ensure the safeguarding of public funds³ and the proper custody of assets which have been publicly funded.
- 3.2. You must carry out your fiduciary obligations responsibly – that is, take appropriate measures to ensure that the CSC uses resources efficiently, economically and effectively, avoiding waste and extravagance. It will always be an improper use of public funds for public bodies to employ consultants or other companies to lobby Parliament, Government or political parties.

Allowances

- 3.3. You must comply with the rules set by the CSC regarding allowances (Honoraria) and expenses. It is your responsibility to ensure compliance with all relevant HM Revenue and Customs' requirements concerning payments, including expenses.

Gifts and Hospitality

- 3.4. You must not accept any gifts or hospitality that might, or might reasonably appear to, compromise your personal judgement or integrity or place you under an improper obligation.
- 3.5. You must never canvass or seek gifts or hospitality.
- 3.6. You must comply with the rules set by the CSC in the Register of Interests and Rules on Conflicts of Interest on the acceptance of gifts and hospitality or other material benefits received by you or close family members. You should inform the Executive Secretary of any offer of gifts or hospitality (and their value if greater than £25) and ensure that, where a gift or hospitality is accepted, this is recorded in The Register of Interests in line with the rules set by the CSC.
- 3.7. You are responsible for your decisions on the acceptance of gifts or hospitality and for ensuring that any gifts or hospitality accepted can stand up to public scrutiny and do not bring the CSC into disrepute.

Use of Official Resources

- 3.8. You must not misuse official resources⁴ for personal gain or for political purposes. Deployment of such resources must be in line with the CSC's rules on their usage.

Use of Official Information

- 3.9. You must not misuse information gained in the course of your service on the CSC for personal gain or for political purpose.⁵

² For more guidance on how to handle public funds, please refer to Managing Public Money <https://www.gov.uk/government/publications/managing-public-money>

³ This should be taken to include all forms of receipts from fees, charges and other sources.

⁴ This includes facilities, equipment, stationery, telephony and other services.

⁵ Commissioners who misuse information gained by virtue of their position may be liable for breach of confidence under common law or may commit a criminal offence under insider dealing legislation.

3.10. You must not disclose any information which is confidential in nature or which is provided in confidence without authority. This duty continues to apply after you have left the Commission.

Political Activity

3.11 In your public role, you should be, and be seen to be, politically impartial. You should not occupy a paid party political post or hold a particularly sensitive or high-profile role in a political party. You should abstain from all controversial political activity and comply with the principles set out in Cabinet Office rules on attendance at party conferences ⁶ and on conduct during the period prior to elections and referendums, whether local or national ⁷.

3.12 On matters directly related to the work of the CSC, you should not make political statements or engage in any other political activity.

3.13 You should inform the Chair, Executive Secretary and/or the parent/sponsor department before undertaking any significant political activity. Subject to the above, you may engage in political activity but should, at all times, remain conscious of your responsibilities as a Commissioner and exercise proper discretion. You should inform the Chair before undertaking any significant political activity.

3.14 If you are an MP, [MEP⁸], member of the House of Lords, member of a devolved legislature, directly elected mayor, local councillor or police and crime commissioner, you are exempt from these requirements. There is no bar on such representatives taking a political party whip relating to their political role. You must exercise proper discretion on matters directly related to the work of the body and recognise that certain political activities may be incompatible with your role as a board member. You should not allow yourself to become embroiled in matters of political controversy.

3.15 In your capacity as a Commissioner, you should be even-handed in all dealings with political parties.

Employment and Appointments

3.16 If you wish to take up additional employment or appointments during your term of office, you must inform the Chair and/or the relevant parent department in advance, and allow them the opportunity to comment. Care should be taken if you accept additional public appointments to ensure that you are not being paid twice from the public purse for the same time. Where appropriate, amend your entry in the Register of Interests.

3.17 On leaving office, you must comply with the rules of the body on the acceptance of future employment or appointments. Each body should have its own rules on this.

⁶ www.gov.uk/government/publications/civil-servants-and-party-conferences-guidance

⁷ www.gov.uk/government/publications/election-guidance-for-civil-servants

⁸ For the period which the UK remains a member of the European Union.

Reputational damage

- 3.18. You should not either within your role as a Commissioner, or in any other aspect of your working or personal life, undertake activity, or behave in a manner, which might reasonably be expected to cause damage to the reputation of the CSC

4. COMMISSIONERS' INTERESTS AND CONFLICTS OF INTERESTS

- 4.1. You must note the CSC 'Rules on Conflict of Interest', and apply this code of conduct in conjunction with these. When accepting your appointment to the CSC you should consider if any conflicts of interest arise from your private interests or by virtue of any other roles you hold. You should consider, with advice from the Foreign, Commonwealth and Development Office (FCDO) how these should best be managed, and agree these with the CSC.
- 4.2. You must ensure that no conflict arises, or could reasonably be perceived to arise, between your duties as a Commissioner and your private interests – financial or otherwise.
- 4.3. You must comply with the rules of the CSC on handling conflicts of interests. As a minimum, these will require you to declare publicly any private financial or non-financial interests of your own, or of close family members, which may, or may be perceived to, conflict with your CSC duties.⁹ The rules will also require you to remove yourself from the discussion or determination of matters in which you have a financial interest. In matters in which you have a non-financial interest, you should not participate in the discussion or determination of a matter where the interest might suggest a danger of bias.¹⁰
- 4..4. It is your responsibility to ensure that you are familiar with the CSC's rules on handling conflicts of interests, that you comply with these rules and that your entry in the CSC's register of interests is accurate and up-to-date.

⁹ In general, all financial interests should be declared. When considering what non-financial interests should be declared, you should ask yourself whether a member of the public, acting reasonably, would consider that the interest in question might influence your words, actions or decisions.

¹⁰ These are common law provisions.

5. RESPONSIBILITIES AS A MEMBER OF THE COMMONWEALTH SCHOLARSHIP COMMISSION

- 5.1. You should play a full and active role in the work of the CSC. You should fulfil your duties and responsibilities responsibly and, at all times, act in good faith and in the best interests of the CSC.
- 5.2 You should promote an inclusive and diverse culture in the body and your actions should help create an environment where different perspectives and backgrounds are encouraged and valued.
- 5.3. You should deal with the public and their affairs fairly, efficiently, promptly, effectively and sensitively, to the best of your ability. You must not act in a way that unjustifiably favours or discriminates against particular individuals or interests.
- 5.4 You must not harass, bully or act inappropriately towards or discriminate towards others. Such behaviour is not consistent with what is expected of you as a board member and will not be tolerated.
- 5.5 You must comply with any statutory or administrative requirements relating to your duties on the CSC.
- 5.6. You should respect the principle of collective decision-making and corporate responsibility. This means that, once the CSC has made a decision, you should support that decision.
- 5.7. You must not under any circumstance use, or attempt to use, the opportunity on the CSC to promote your personal interests or those of any connected person, firm, business or other organisation.
- 5.8. You must inform FCDO of any bankruptcy, current police investigation, unspent criminal conviction or disqualification as a company director in advance of appointment, or should any such instances occur during your appointment, you must inform the CSC Chair, who will inform FCDO of any such changes in your circumstances.
- 5.9. Commissioners should refer all enquiries received from members of the public/media/applicants or award-holders to the Secretariat for a response or for advice or an appropriate personal response.
- 5.10. The Chair of the CSC has additional responsibilities in leading the Commission and in ensuring that the principles covered in the Codes of Conduct for Commissioners and Secretariat Staff (where applicable) are upheld.

6. SAFEGUARDING RESPONSIBILITIES TOWARDS COMMISSION SECRETARIAT AND/OR EMPLOYEES/ AND AWARD HOLDERS

- 6.1. The Commission is committed proactively to safeguard and promote the welfare of our beneficiaries, and all those with whom members come into contact. The CSC requires Commissioners, members of its Secretariat and anyone who delivers services on its behalf, as well as applicants for and recipients of CSC awards and members of host and nominating institutions, to act consistently with their requirements for safeguarding.
- 6.2. You will treat any staff engaged within the CSC Secretariat, or within any other organisation contracted to provide services to the Commission, with courtesy and respect. It is expected that such staff will show you the same consideration in return.
- 6.3. You will not ask or encourage Secretariat staff or employees of any other organisation contracted by the Commission, to act in any way which would conflict with their own Code of Conduct.
- 6.4. You will treat all award holders and Alumni, with courtesy and respect.
- 6.5. You are required to be alert and responsive to any safeguarding issues and to raise any concerns you might have in accordance with the CSC Safeguarding Policy.

7. SOCIAL MEDIA

- 7.1 Social media is a public forum and the same considerations, including the provisions of this Code, apply as would to speaking in public or writing something for publication, either officially or in a personal capacity. When engaging with social media you should at all times respect confidentiality, financial, legal and personal information.
- 7.2 Where any personal social media accounts used by you make reference or link to your role as a CSC Commissioner, you should take care to ensure that it is clear in what capacity you are acting.

8. RAISING CONCERNS

- 8.1 You should ensure that the Commission has an open, transparent and safe working environment where members and Secretariat staff feel able to speak up and raise concerns, and complaints procedures are clearly communicated to them.
- 8.2 If you have a concern about a possible breach of this Code, a concern that you or Secretariat staff are being asked to act in contravention of their own code of conduct, or a concern about misconduct or wrongdoing in any other areas, then you have a responsibility to raise that internally with the Chair of the CSC or the Permanent Secretary of FCDO as appropriate.

