

COUNCIL
24 March 2026

Officers' Code of Conduct (Constitutional Amendment)

Report by the Director of Law & Governance and Monitoring Officer

RECOMMENDATION

1. **Council is RECOMMENDED to amend the Constitution at Part 9.6 Officers' Code of Conduct.**

Executive Summary

2. On 11 March 2026, the Audit and Governance Committee considered and approved the revised Officers' Code of Conduct with a request to include a reference to the Nolan Principles, and recommended that Council amend the Constitution.
3. To strengthen internal governance and effectively manage risk, standards and employer-employee expectations, it is good practice for local authorities to maintain an up-to-date Officers' Code of Conduct (Code). The purpose of the Code is to establish clear standards of ethical and professional behaviour, promote integrity and accountability, maintain public confidence, and provide guidance to those working for or on behalf of the council in the discharge of their duties.
4. A comprehensive review of the Code was undertaken by the Director of Law & Governance and Monitoring Officer, taking into consideration best practice, and benchmarking against other authorities. The review identified and recommended substantial amendments to ensure the Code reflects current council values, working practices and organisational requirements.
5. The Officers' Code of Conduct includes many hyperlinks to the Council's Intranet (The Hive). These are only accessible to staff and councillors who have login rights to the Intranet.

Governance Arrangements

6. The Code is a key governance document and forms part of the constitution of the council. It is published on the intranet and on the Council's website. The current Code was last updated in April 2017.
7. An internal audit report from February 2025 concerning key governance processes highlighted the requirement to update all relevant policies to reflect

current working practices. The revised Code has been amended to align with all other governance policy updates.

Consultation

8. The revised Code was amended in consultation with the Senior Leadership Team, including the Chief Executive and the Deputy Chief Executive (S.151 Officer), colleagues from HR and Cultural Change and the Trade Union. Subject specialist officers were also consulted, particularly in relation to Fraud and Data Protection.

List of Amendments

9. The Audit & Governance Committee approved the revised Code, which includes the following key changes:

	Section	Change	Reference
a)	Scope	<p>The scope of the Code has been expanded to ensure all those working on behalf of the council are covered.</p> <p>The Code also covers agency workers and contractors working for, or on behalf of the council, though not directly employed by the council (including sole traders/individuals who are supplying their personal services but not deployed via a contract of employment).</p>	Para. 7
b)	Council's Values	<p>The council has adopted new values since the last update of the Code.</p> <p>Previous values: <i>We do the best we can for residents:</i> <i>This means we:</i></p> <ul style="list-style-type: none"> - <i>work together in a supportive and honest way</i> - <i>strive to find the best solutions</i> - <i>are open to change and doing things differently</i> <p>Current values:</p> <ul style="list-style-type: none"> - Always learning; - Be kind and care; - Equality and integrity in all we do; - Taking responsibility; and 	Para. 10

		- Daring to do it differently	
c)	Equality, Diversity and Inclusion	This section has been updated to include a reference to the Including Everyone: Equalities Diversity and Inclusion framework.	Para. 12
d)	Climate and Environmental Considerations	<p>This section has been updated to set out the council's ambition for its operations to be at net zero carbon emissions by 2030 and for the county to be net zero carbon emissions as early as possible in the 2040s.</p> <p>It clarifies that it is the responsibility of all officers to conserve energy, reduce waste, prioritise sustainable travel options and consider sustainability when procuring goods and services. Managers have the responsibility to encourage and facilitate sustainability and carbon reduction within their teams.</p>	Para. 14
e)	Relations with Members of the Council, Public and Other Officers	<p>This section has been updated to reflect the changes made in other officer policies and the Protocol on Member-Officer Relations. The main changes to note are:</p> <ul style="list-style-type: none"> - The requirement for declarations of interest where close personal familiarity between members and officers exists; - The requirement for declarations of interest where personal relationships between officers exist; - The requirement to treat other officers with dignity and respect, creating an environment where bullying, harassment (including sexual harassment) and discrimination is not tolerated. 	Para. 15
f)	Health and Safety	This is a new section setting out the responsibilities of officers to take reasonable steps to protect their own health and safety and that of other people who may be affected by their work and anyone with whom they come into contact in the course of their work.	Para. 16-17

g)	Use of Technology, Electronic Devices, Internet and Email	<p>The updates reflect the changes in the use of technology and electronic devices for work purposes and include an expansion of the rules relating to the use of equipment.</p> <p>There is also a new paragraph relating to working abroad (outside the United Kingdom).</p>	Para. 38-42
h)	Confidentiality	A clarification is provided on confidentiality requirements post-employment.	Para. 49
i)	Data Protection	This section has been updated to reflect the changes in Data Protection legislation. It sets out the Council's responsibilities relating to handling personal data, and the rights of the public in accessing their own personal data.	Para. 51-55
j)	Private Interests	<p>This section has been updated to reflect the changes in the Conflicts of Interest – Declaring and Registering Interests Policy.</p> <p>The new requirements include:</p> <ul style="list-style-type: none"> - Making a declaration of interest, including a nil declaration (if applicable) upon appointment, and - Mandatory declaration of secondary employment, directorships in companies operating within the county of Oxfordshire, or where a relative or partner is employed by the council. 	Para. 56-58
k)	Secondary Employment	This section has been updated, now setting out requirements to consult with the manager and obtain written consent prior to engaging in secondary employment.	Para. 59-61
l)	Council Company Appointments	This is a new section. There is the possibility that officers may assume the role of a director on a Board of Directors. Any such director who has a dual role as a council officer will be	Para. 67-69

		required to make a declaration of interest.	
m)	Mandatory eLearning Modules	<p>This is a new section setting out the mandatory e-learning modules that all officers are required to complete as part of their induction:</p> <ul style="list-style-type: none"> - Acceptable Use of Information - An introduction to Health and Safety - Climate Action - Data Protection - Everyday Inclusion - Safeguarding Adults Level 1 - Safeguarding for all: Children's Edition - Sexual Harassment at Work - Stay Safe Online - Whistleblowing 	Para. 74
n)	Raising Concerns at Work - Grievances and Whistleblowing	This section has been updated to further clarify the differences between grievances and whistleblowing, and how they will be handled.	Para. 77

Financial Implications

10. There are no financial implications arising directly from the report.

Comments checked by: Bick Nguyen-McBride, Finance Business Partner, Resources, Community Safety, and Technology & Customer Experience

bick.nguyen-mcbride@oxfordshire.gov.uk

Legal Implications

11. There are no legal implications arising directly from the report.

Comments checked by: Jay Akbar, Head of Legal and Governance

jay.akbar@oxfordshire.gov.uk

Staff Implications

12. There are no staff implications arising directly from the report.

Comments checked by: Chloe Barlow, Industrial Relations and HR Policy Manager

chloe.barlow@oxfordshire.gov.uk

Anita Bradley

Director of Law & Governance and Monitoring Officer

Annex: Officers' Code of Conduct

Contact Officer: Zaqia Hussain, Senior Governance Lead
Governance@oxfordshire.gov.uk

March 2026