

Code of Conduct

Staff Policy



Prepared by Audit Scotland
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Code of Conduct

Introduction

1. Audit Scotland and our staff must demonstrate high standards of corporate and personal conduct. This can be achieved by embracing our core values, which are:

- Equality
- Independence
- Innovation
- Integrity
- Respect.

2. This Code of Conduct gives you clear and helpful advice about the standards of behaviour expected of you as a member of staff. The Code will be reviewed annually and is subject to change. A serious breach of the Code may lead to disciplinary action.

3. In addition, you are required to comply with the principles of the Ethical Standard issued by the Financial Reporting Council. Guidance on the application of the standard can be found in [Ethical Standard – Application Guidance and Policies](#). Our application guide has five main sections which cover:

- General requirements and guidance.
- Financial, business, employment and personal relationships.
- Long association with engagements and with entities relevant to engagements.
- Fees, remuneration and evaluation policies, gifts and hospitality, litigation.
- Non-audit / Additional services provided to audited entities.

4. You should also keep to the Codes of Conduct of the professional bodies of which you are a member.

5. The general principles upon which this Code of Conduct is based are:

- **Duty** - You have a duty to uphold the law and act in accordance with the law and the public trust placed in you. You have a duty to act in the interests of Audit Scotland of which you are a staff member and in accordance with its core functions and duties.

- **Selflessness** - You have a duty to take decisions solely in terms of public interest. You must not act to gain financial or other material benefit for yourself, family or friends.
- **Integrity** - You must not place yourself under any financial, or other, obligation to any individual or organisation that might reasonably be thought to influence you in the performance of your duties.
- **Objectivity** - You must make decisions solely on merit and in a way that is consistent with the functions of Audit Scotland when carrying out public business including making appointments, awarding contracts or recommending individuals for rewards and benefits.
- **Accountability and stewardship** - You are accountable for your decisions and actions to the public. You have a duty to consider issues on their merits, taking account of the views of others and must ensure that Audit Scotland uses its resources prudently and in accordance with the law.
- **Openness** - You have a duty to be as open as possible about your decisions and actions, giving reasons for your decisions and restricting information only when the wider public interest clearly demands.
- **Honesty** - You have a duty to act honestly. You must declare any private interests relating to your public duties and take steps to resolve any conflicts arising in a way that protects the public interest.
- **Leadership** - You have a duty to promote and support these principles by leadership and example, and to maintain and strengthen the public's trust and confidence in the integrity of Audit Scotland and its members in conducting business.
- **Respect** - You must respect colleagues and the role they play, always treating them with courtesy. Similarly, you must respect members of the public when performing duties as a staff member of Audit Scotland.

Relationships

6. You may have contact with audited bodies, other organisations or members of the public. You should deal fairly, equitably and consistently with those you meet, and you should always be polite and portray a positive and professional image of Audit Scotland.

7. People may develop a relationship with you to influence our work or to acquire confidential or sensitive information for personal gain. They may also offer a financial or other benefit to supply them with information. These relationships are inappropriate and bring risks to your personal

reputation and that of Audit Scotland (see Bribery and corruption). You must tell your line manager of any such approaches, relationships or offers of financial or other benefits, and you should do this as soon as possible so that Audit Scotland can support and advise you.

8. Audit Scotland recognises that close personal or domestic relationships with colleagues may exist or develop during their employment. In order that Audit Scotland's business is conducted and perceived to be conducted in a professional and proper manner it is necessary to distinguish between, and take account of, personal relationships which overlap with professional ones in the workplace. If you have any close personal or domestic relationships where that relationship may impinge on your duties and responsibilities this must be declared in confidence to your line manager or senior manager. If necessary, upon disclosure of such a relationship and after consultation with both parties, reasonable arrangements will be made to ensure that future working arrangements and potential conflicts do not arise.

Contractors, suppliers and consultants

9. You must be fair and impartial in your dealings with contractors, suppliers and consultants. If you are involved in procuring or tendering for contractors, suppliers, or consultants, you must follow Audit Scotland's Procurement Handbook, which is based on the Scottish Government's *Procurement Journey* and other relevant procurement guidance.

10. If you have access to confidential information on tenders or costs for contractors, suppliers or consultants you must not show that information to any unauthorised person or organisation.

11. All private relationships with actual or potential contractors, suppliers or consultants must be declared, as set out below.

Independence, objectivity and conflicts of interest

12. It is important that you carry out your work with independence and objectivity, and that you do not allow any private interest to influence your decisions. You must not use your position to further your own interests or the interests of others who do not have a right to benefit from our work.

13. You, or a member of your family or household, may have a private interest which relates to the work of Audit Scotland. It may be a financial one or one which a member of the public might reasonably think could influence your judgement. For example, you may be a member of a public body, an organisation or club and membership might lead to a conflict of interest with your work. This also applies to membership of organisations or clubs which are not open to the public e.g. Freemasonry.

14. You must declare all such interests to Audit Scotland's Ethics Partner - the Executive Director of Innovation and Quality. The best way of making

such a declaration is to use the Fit & Proper Self-Assessment Form. This information is then retained in a secure area of SharePoint for three years, after which it is destroyed. The Ethics Partner will contact you and discuss any issues arising from your disclosure, as appropriate.

15. Fit & Proper Self-Assessment forms are completed by all new staff and other workers when starting their employment / assignment with Audit Scotland. Audit Scotland annually requests that the form is refreshed. If, between the annual cycle, your circumstances change, and you have information that should be reported to the Ethics Partner then it is your responsibility to do so immediately.

16. The Fit & Proper Self-Assessment form can be accessed on the [Ethics](#) SharePoint site.

17. Staff must also notify the Ethics Partner if they are applying for any employment in a public body subject to audit by auditors appointed by the Auditor General or Accounts Commission (see the Ethical standard – application guidance and policies).

Openness, disclosure and protection of information

18. Audit Scotland carries out its work in the public interest and is committed to the principle of openness. You should comply with the Freedom of Information (Scotland) Act and the Data Protection Act 2018 along with our Freedom of Information and Environmental Information Regulations policy and the Data Protection policy.

19. There are occasions when information gathered during your work must be kept confidential, both inside and outside the organisation and after leaving Audit Scotland. For example, when its disclosure would prejudice an investigation, breach confidentiality or contravene data protection legislation. This does not apply where there is a legal duty to provide information. You should follow our information management policy and procedures, including completing information management training when required.

20. We take information security very seriously. You must protect our information from inappropriate access, abuse, loss or damage. You must report any instance of this as quickly as possible and help fully in any investigation. Any breach of confidentiality or security may lead to an investigation under our disciplinary policy. Any wilful breach, such as unauthorised access or supply of information to others, could lead to the termination of your employment and to a criminal prosecution under data protection legislation. If you are in any doubt about a matter of confidentiality or security, please check with your manager.

21. If you are involved in an act that could cause Audit Scotland reputational risk or bring us into disrepute, e.g. you are arrested or

charged for a criminal offence, you must tell Audit Scotland as soon as possible.

Paid employment outside Audit Scotland

22. We will normally allow you to undertake paid employment outside Audit Scotland in your own time unless there is a conflict of interest, or it is likely to have an adverse effect on the work of Audit Scotland or on your own performance. A conflict of interest can arise where a member of staff seeks to do work for an audited body or to carry out work which relates to the work of Audit Scotland. Outside employment can adversely affect the work of Audit Scotland if it damages the organisation's reputation. It can affect your own performance if it significantly reduces your ability to carry out your duties.

23. If you do work outside Audit Scotland you must first get the approval of your Executive Director or the Chief Operating Officer and then advise the Human Resources team. This procedure is in your interests. It will also allow us to meet our legal obligations in relation to family friendly benefits and Working Time Regulations. You are not allowed to use the equipment and resources of Audit Scotland in any outside employment.

24. If you receive a fee for a publication, broadcast, speech or lecture where you have used official information, or your own work experience you must remit that fee to Audit Scotland. This also applies to external work carried out in working hours which attracts a fee. You may keep tokens of appreciation such as book tokens or commemorative items. You should let the Chief Operating Officer know of any tokens received as it will be recorded in a register kept for that purpose.

Hospitality

25. You should not accept or offer hospitality connected with your work unless you can justify it and be sure that it will not lead to criticism from colleagues or the public. In general, modest hospitality may be acceptable in some circumstances for example, a sandwich lunch.

26. Accepting, declining or giving of hospitality should be declared and recorded in the register kept for that purpose. When accepting or giving hospitality, you should get approval from your Executive Director or the Chief Operating Officer. Hospitality given must be recorded in the register and the expenditure detailed in our financial accounting system. You must make sure that you charge the hospitality to the hospitality code 1255 and the appropriate cost centre for your business group. All reimbursement claims for hospitality given through expenses must follow the travel and expenses policy.

27. To help you decide what to declare, the following guidance may be useful:

Reporting hospitality received

28. Items not requiring declaration and recording are:

- Working lunches at audited bodies, partner firms, working groups/committees, boards, professional institutes and other public bodies.
- Meals and accommodation related to attendance at conferences, seminars and workshops.

29. Items that would require disclosure include:

- Meals in external restaurants, whether working or not.
- Attendance at functions organised/hosted by professional bodies.
- Receptions held by public bodies, partner firms or other parties where there is a widespread range of attendees, e.g. gallery viewings.
- Functions where the focus of the event is an awards ceremony which involves a public-sector element.
- Meals paid for by visiting delegations from other audit offices and Parliaments/ Governments.

30. You should not accept offers to attend social or sporting events unless it would be of benefit to Audit Scotland or where Audit Scotland would expect to be represented.

31. In exceptional circumstances it may be appropriate to accept hospitality to avoid embarrassment or offence for example, hospitality offered from overseas hosts when we are carrying out international work.

32. You should not accept repeated hospitality from the same source.

Reporting hospitality declined

33. Any offers of hospitality that you decline must be recorded.

Reporting hospitality given

34. Items not requiring declaration and recording are:

- Working lunches when hosting meetings and conferences with audited bodies, partner firms, working groups/committees/boards, professional institutes and other public bodies. Lunches should be modest in scale and may typically consist of a buffet/sandwiches and tea and coffee throughout the day.
- Travel costs as part of recruitment.

- Consultant travel and accommodation costs where this is part of the consultant's fee.

35. Items that would require disclosure would therefore include:

- Meals provided in external restaurants whether working or not.
- Meals provided to international visitors/groups.
- Provision of overnight accommodation.
- Provision of travel, e.g. flights or train tickets.
- Hospitality at or the provision of theatre or sporting event tickets.

Gifts

36. You must never ask for or seek gifts or hospitality.

37. As a rule, you should normally decline gifts offered in connection with your work. All gifts with a commercial value, whether accepted or declined, must be recorded in the gifts and hospitality register.

38. Promotional items with no meaningful commercial or resale value, such as pens, calendars or notebooks, may be accepted and do not need to be declared.

39. A gift may only be accepted in circumstances where refusal would cause offence, damage an important relationship or otherwise be contrary to Audit Scotland's interests. Approval must be obtained from an authorised budget holder or delegated senior manager in accordance with the Scheme of Delegation. Cash, vouchers and other cash equivalents must never be accepted.

40. Where an inappropriate gift is received and you are unable to return it or the donor refuses to accept its return, you should report the circumstances to an authorised budget holder or delegated senior manager in accordance with the Scheme of Delegation.

41. Any gifts with a commercial value will belong to Audit Scotland and are not a personal gift to you. The Chief Operating Officer keeps a register to record gifts, whether they are accepted or declined and to show that acceptance was authorised. Innovation and Quality maintain a subsection of the gifts register for international work. Any gifts given or received while carrying out international work should be recorded in the register.

42. Gifts should only be given where there is a clear business purpose. They will normally be limited to international visits and should be modest in value and appropriate to the occasion. Gifts given to non-international visitors or organisations must be recorded in the gifts and hospitality

register. Items with no commercial value do not need to be recorded. Alcohol must not be given as a gift.

43. Gifts recorded in the register must have the expenditure detailed in our financial accounting system. You must make sure that you charge the gift to the hospitality code 1255 and the appropriate cost centre for your business group. All reimbursement claims for gifts given through expenses must follow the travel and expenses policy.

Bribery and corruption

44. Bribery is the offering, giving, receiving, or soliciting of any item of value or advantage to influence the actions of an official or any other person in charge of a public or legal duty.

45. It is a serious criminal offence for you to:

- give, receive or solicit a bribe (i.e. to corruptly receive or give any gift, loans, fee, reward or advantage) in return for doing or not doing anything
- show favour or disfavour to any person in the course of your work.

46. An act of bribery by an individual may make Audit Scotland liable of committing an offence. We have a zero tolerance to bribery and corruption, and such an act can lead to dismissal and prosecution.

47. If you become aware of conduct, decisions or practices that may be illegal, improper, unethical, unsafe or inconsistent with this Code, you should raise your concern in line with the Whistleblowing Policy.

Use of resources

48. You and your colleagues serve the public, and you must remember this principle when you use Audit Scotland's equipment, materials and resources to ensure value for money and economy, efficiency and effectiveness.

49. The equipment of Audit Scotland is available to you for use in your personal affairs, provided that:

- it is in your own time
- the cost of any consumables, e.g. paper, postage, telephone calls is met by you
- you are not receiving any fee or reward for the purpose.
- you don't store your personal (non-work related) information on Audit Scotland equipment, and you follow the Information acceptable use policy.

Appointments

50. All appointments must be made on merit. If you are involved in the recruitment and selection process and have any kind of relationship which might affect your ability to be impartial, it must be declared to your Director (Corporate Services, AQA or Accounts Commission) or Executive Director, or the Chief Operating Officer and Human Resources.

51. Your Director (Corporate Services, AQA or Accounts Commission) or Executive Director or the Chief Operating Officer and the person chairing the selection process will decide whether you can take part in the process. The same procedure must be followed in other HR processes such as grievance, disciplinary, or performance reviews.

52. You must not try to influence board members or a colleague either directly or indirectly to secure your own appointment or promotion, or the appointment or promotion of another person. You must report any instances of this occurring to your Director (Corporate Services, AQA or Accounts Commission) or Executive Director or the Chief Operating Officer, and the Head of HR.

Disclosure

53. We have access to a broad range of sensitive data and several of the bodies we audit request staff to be security checked. The integrity and security of public information is core to the values of Audit Scotland and therefore all employees are subject to Disclosure checks in line with our Security Vetting and Clearance policy which can be found in the Staff Handbook.

54. Baseline Personnel Security Standard (BPSS) is the entry level check and forms part of a package of checks that represent good recruitment and employment practice. It provides an appropriate level of assurance as to the trustworthiness and integrity of prospective and existing workers. It involves verification of identity, nationality, and immigration status together with employment history and criminal record declaration. The basic criminal record check (through Disclosure Scotland) will be carried out which will show any unspent convictions. Everyone working with Audit Scotland will be asked to consent to this baseline level (level 1) of security clearance.

55. The next level is called Level 2 (previously called Standard Disclosure) Only those who are accountants require a Level 2 check. Some workers in our Finance team may be required to participate in checks to this level due to the nature of their work as accountants. Level 2 checks enable Audit Scotland to check for certain spent convictions.

56. Enhanced Disclosure will only be needed when a worker is working with children or vulnerable people in the course of their work. If the worker is to be involved in such work on a long-term basis then Audit Scotland

may decide to include security clearance in line with the Protection of Vulnerable Groups (PVG) to ensure continuous monitoring of the workers status. If necessary, this is undertaken by our HR team.

57. Security Clearance, Counter-terrorism checks and Developed Vetting will normally only be required when workers are involved in dealing with secret or sensitive data. Your manager will discuss this with you if it is required. This may be undertaken by the HR team or by our client organisation (i.e. Scottish Police Authority, Scottish Corporate Parliamentary Body etc.).

58. Media All media enquiries must be referred to the Communications Team. Staff should not respond directly to media enquiries or requests for comment, regardless of the circumstances, unless expressly authorised by the Head of Communications. Media training is available for staff most likely to need it. Contact the Communications team or your line manager for more information.

Social media

59. Audit Scotland has a Social Media Hub which sets out guidance for staff on how to conduct themselves on social media platforms. Employees must conduct themselves according to high standards at all times and be conscious that they act in the best interests of Audit Scotland.

60. When posting on social media platforms staff must be vigilant about:

- posting political views, or comments that could compromise your duty to be politically neutral in public
- commenting on issues linked to public bodies or public figures, even in a private capacity, to not compromise the objectivity of the audit
- posting derogatory or inflammatory comments, or getting into heated exchanges with others
- understanding whether a post is public or private. It can be easy to think you are posting to a private group but in fact be posting for anybody to see.

Political neutrality

61. It is essential that Audit Scotland is seen to be free from political bias. The public expects you to carry out your work in a politically neutral way. You must follow our policies, despite any personal views, and you must not do anything which might call into question the independence and political neutrality of Audit Scotland.

62. We support an individual's freedom to participate in public affairs and hold personal beliefs and opinions, and to this end our people can be

members of political parties, and they can engage in local and national political activities outside of the restrictions set out below.

63. All staff must, however, receive the written permission of the Ethics Partner before any activity is undertaken. The restrictions in respect of political activity are as follows. Our people cannot:

- Stand as candidates for or be co-opted into any local or national assembly.
- Hold roles in any party-political organisations in the field of national or local government
- Speak in public on matters of local or national political controversy where the impartiality of the comments may be called into question.
- Express views on such matters in letters to the press, books, articles, or in any other media, including social media.
- Canvas on behalf of candidates for any local or national assembly or on behalf of a political party.

64. In seeking the written permission from the Ethics Partner, individuals should give precise details of the intended activities and the period over which the activity is likely to take place. If permission is given the activity must not take place while the individual is on duty as an employee of Audit Scotland or on official premises.

65. Staff must observe the Official Secrets Acts at all times.

66. Individuals must not make any reference to their employment by Audit Scotland when speaking in public, except where they are required by law to declare an interest. If any risks to the interests of Audit Scotland arise from involvement in approved political activities, individuals will be required to withdraw their participation. Failure to do so may result in formal disciplinary procedures.

67. The Ethics Partner is the senior authority on what constitutes political activity and what is subject to restriction.

68. The above measures are not intended to discourage people from participating in public service activities such as school governors, approved non-executive directors, trade union work, or volunteering. The key consideration is that staff should avoid any possibility that their activities might impact on Audit Scotland's political neutrality.

Health and safety at work

69. We have a duty to ensure that all reasonable steps are taken to provide staff with a safe and healthy working environment. We will comply

with the Health and Safety at Work Act 1974, any other associated legislation and statutory codes of practice.

70. You have a duty under the Health and Safety at Work Act 1974 for the health, safety and welfare of yourself and others, including members of the public who may be affected by what you do or fail to do at work. You must comply with our Health and Safety policy and cooperate with us in our compliance with health and safety legislation.

Fair and reasonable treatment at work

71. Audit Scotland is committed to providing a working environment that is free from bullying and harassment of any nature. A workplace culture, where bullying or harassment of any nature is tolerated, is harmful to the wellbeing of our colleagues, as well as the wider organisation. We are committed to addressing non-inclusive behaviours promptly and appropriately when they arise.

72. Our Bullying and Harassment policy is available on the staff handbook and is regularly reviewed. All colleagues should be familiar with the policy and aware of the process to disclose any bullying or harassment.

73. You should expect fair and reasonable treatment from your colleagues and managers. If you feel that you have been unfairly treated or have been discriminated against, there is a grievance procedure that you can use.

74. Bullying and harassment will be treated as a serious disciplinary offence. All managers have a duty to establish and maintain a working environment free from bullying and harassment. All employees must comply with our Bullying and Harassment policy and take steps to ensure that bullying and harassment does not occur.

75. We value and promote diversity and equality of opportunity. We expect you to carry out your work following the principles within our diversity and equality policy.

76. Creating and maintaining an inclusive workplace is everyone's responsibility. All colleagues are expected to support Audit Scotland's equality, diversity and inclusion objectives through their behaviour, interactions and decision-making, and by participating in mandatory training and development activities where required. We expect you to support and comply with our policies, practices and procedures, both in your dealings with colleagues and those outside the organisation. You should not do anything which might undermine or adversely affect any position or decision of Audit Scotland.

Working at home

77. Audit Scotland has a clear commitment to a range of flexible working options, including working at home. The Hybrid Working policy sets out

how this works in practice. Some roles may require full-time office working or a greater in person presence, in the office or on client sites, than others.

78. Working at home can be required by the Incident Management Team for all staff during a national pandemic, and for an unspecified duration.

79. While working at home, we expect you to adhere to our policies, practices and procedures on digital security and data protection.

80. Health and safety is an organisational priority. While working at home, it is essential that you adhere to organisational requests around home workstation assessments to ensure that your health and safety needs are met. Training and assessments are available on the Learning Management System.

Version control

Description	Actioned by	Date
Annual review in advance of Executive Team	Head of Performance & Corporate Governance	08/08/2025
Significant annual review prior to Executive Team consideration	Head of Performance & Corporate Governance, Head of HR and Director of Corporate Services	12/08/2026
Board approval	Audit Scotland Board	24/09/2026

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