

# Ngā Tikanga Whanonga Code of Conduct

Living our values



# Te tiro whānui

## An overview of our Code of Conduct

Our Code is organised under five sections to help us conduct our business legally, ethically, responsibly and in alignment with our values.

### Introduction

We understand our responsibilities, and we do what's right every day.

### Our Council

We understand that the Council is a political environment and we remain politically neutral when we work for the Council.

### Our people

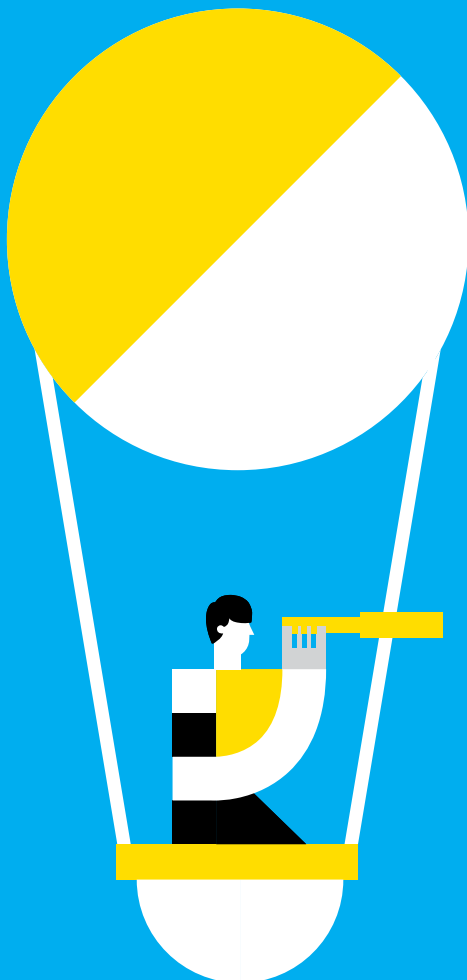
We act with integrity. We treat each other with fairness, dignity and respect. We keep each other safe.

### Our customers, communities and the environment

We are committed to our customers, and to the communities we serve where our people live and work. We are committed to sustainability by striving to minimise our environmental impact.

### Our assets

We protect our reputation and our assets, so we can better serve our customers and communities.



# Ngā kaha

## Our values

Our values and behaviours underpin our Code of Conduct



He tangata, he tangata,  
he tangata

We put people at the heart of what we do

- We anticipate our customers' needs
- We support our colleagues
- We listen to our customers and each other
- We act with integrity and respect



Mahi ngātahi

We collaborate

- We share our skills and knowledge
- We have confidence in our colleagues
- We work together to get the best results
- We are accountable for our actions and decisions



Whakapai ake

We're always improving

- We are open to new ideas and innovation
- We encourage creativity
- We learn from our mistakes
- We give constructive feedback, compliment good work and reward success



Mana tiaki

We care for our places

- We protect our environment for future generations
- We are guardians of our city's assets
- We nurture our communities
- We consider the impact of what we do

# Rārangi upoko

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# Wāhinga kōrero nā te Tumuaki Message from the Chief Executive



Mā ngā Tikanga Whanonga ka pai ake tā tātou mahi ngātahi, ka whakapakari hoki i te rongō i ngā mahi pai o te Kaunihera.

Our Code of Conduct supports how we work together and builds on our positive reputation through the decisions we make and the actions we take.

This Code has been developed in consultation with staff to find an agreed way of working together that is practical, relevant and useful in our everyday working lives. It is also intrinsically linked to our organisation's values and behaviours.

The Code is our shared commitment to our values, aids compliance with legislative requirements and helps us all:

- create a positive work environment for everyone;
- build effective and trusted relationships with Councillors;
- provide a great experience for our customers;
- and build a strong reputation in the community.

It is important that we all show good judgement and common sense in complying with the Code. Our actions will help us to show pride in ourselves, in those we work with and in the community we serve.

I expect everyone working for Wellington City Council to follow the highest standards of ethical behaviour when dealing with ratepayers, customers, suppliers, the community and each other.

As representatives of the Council, we must be responsible for our own good behaviour, sensible use of public resources and comply with relevant laws, regulations and the Council's policies, guidelines and procedures. As leaders, we are all responsible for encouraging a culture where demonstrating our values is recognised, rewarded and followed at all levels. That is why it is expected that everyone will follow the standards of behaviour in the Code.

I am pleased to provide you with Wellington City Council's Code of Conduct. I trust you will refer to it often, in order to help you make the right decisions and contribute to the Council being a great place to work.

Kevin Lavery  
Chief Executive

A handwritten signature in black ink that reads "Kevin Lavery". The signature is written in a cursive, flowing style.

# Kupu Arataki Introduction

## Why do we have a Code?

Doing the right thing matters. The Code of Conduct outlines what's expected of us and is the link between our values and our policies, guidelines and procedures.

It's about how we do things when we work at the Council – it's about appropriate and acceptable behaviour, and, of course, it's about complying with the law.

The aim is for our employees, contractors and consultants (collectively referred to as our staff) to feel supported to make smart choices, manage risks and have a great experience at the Council.

Everyone has a responsibility to speak up when there is, or could be, a situation that may breach or lead to a breach of the Code, our policies, or the law.

Depending on the circumstances, steps might be taken to find a solution to the problem. This could include training, counselling, and/or disciplinary action (in the case of employees), or termination of engagement (in the case of contractors and consultants).

In all circumstances, we must obey the law. It is important that we are familiar with the acts and regulations that directly affect our work and be aware of and respect the processes of the law.

Advice and guidance on the Code can be found on page 7.

You can download a copy of this Code on our intranet, Pokapu.

## Who must follow the Code?

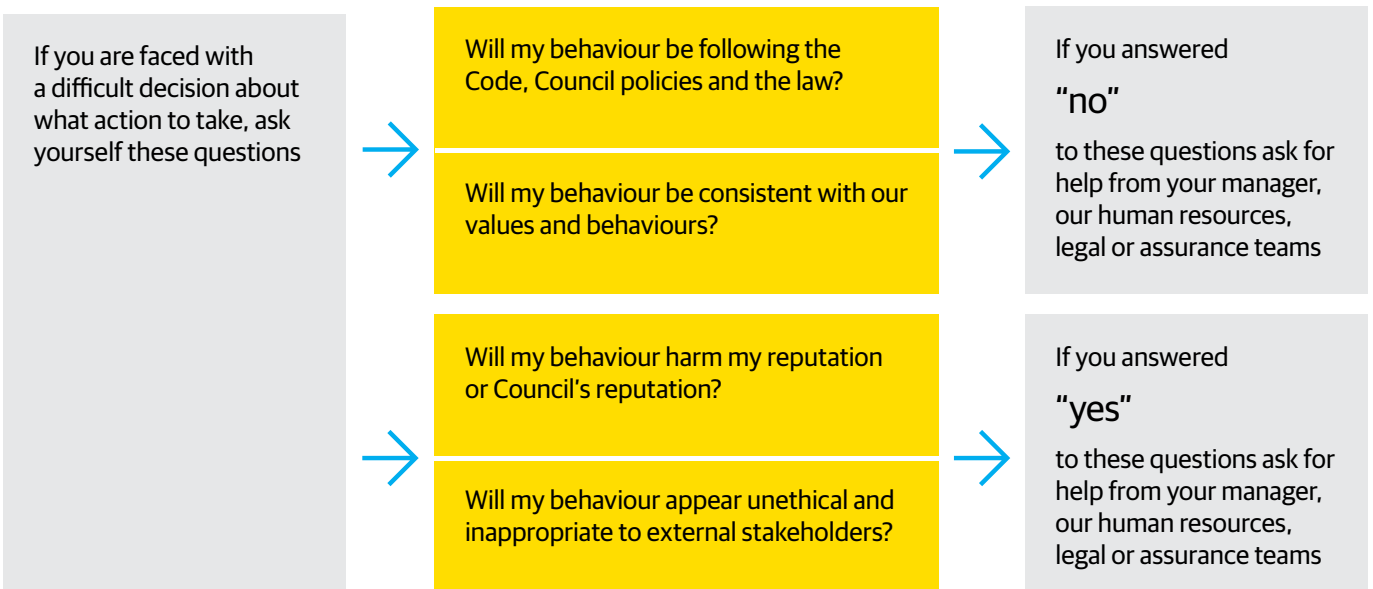
The Council has developed the Code in consultation with staff, and it applies to all employees, contractors and consultants working for us. We have a separate Code for our Councillors and the Mayor. There is a copy on our website.

## How do we use the Code?

Because employees have different rights and obligations to contractors and consultants, not all of the same standards and potential outcomes set out in the Code will apply in the same way to different staff members.

Managers or team leaders can discuss any issues or answer any questions staff may have.

## How to make the right decision



## Where to go for advice and guidance on the Code?

You are not alone! The Council has processes, guidance and procedures to help you follow our Code, the Council's policies and the law. Any doubts about what decision to make or questions about reporting any concerns, you can ask for advice from:

- **Your manager or team leader**  
They are available in the first instance for advice on our policies, processes and guidelines. They can answer questions about the Code and help you make the right decisions.
- **Human Resources**  
They can explain and interpret the Code and answer questions about your employment obligations, safety, security and wellbeing, policies, workplace issues or raising concerns.
- **Legal and Risk**  
They can help explain the Code and provide guidance about how to conduct business on behalf of the Council, in compliance with the law.
- **Assurance**  
They can assist with advice about conflicts under the Code. They are also responsible for responding to people who report serious wrongdoing as a protected disclosure.

## Informal approach

The Council has both informal and formal procedures available to manage issues of employees' performance or misconduct. When dealing with issues, managers or team leaders need to address issues as early as possible. Where appropriate the employee concerned will have the opportunity to improve and meet expectations, and continue to prosper in their role. A successful informal intervention would result in the employee meeting and maintaining the performance and conduct requirements of their role.

Managers or team leaders should use an informal approach if it has not been tried before or could resolve the issue, or when the employee's behaviour does not appear to be significant. There may be circumstances where, despite an informal approach, the situation hasn't been resolved, or the significance of the situation means a more formal approach is needed.

## An employee's responsibilities

- Act in good faith towards the Council
- Maintain required standards of performance
- Comply with all lawful and reasonable instructions provided by the Council as referenced in our employment agreements
- Adhere to the Council's policies, standards and Code of Conduct
- Demonstrate the Council's values and behaviours
- Support the use of Treaty of Waitangi principles - 'partnership, protection and participation', and te reo Māori through our work.

## A contractor or consultant's responsibilities

- Comply with the terms outlined in the contract for services or agreement for consultancy services
- Demonstrate our values and behaviours
- Support the use of Treaty of Waitangi principles - 'partnership, protection and participation', and te reo Māori through our work.

## A manager's responsibilities

As a manager or team leader, we have an important responsibility to set an example and act in a manner consistent with the Code. Below are some guidelines:

- Act as a role model, demonstrating ethical behaviour in line with the Council's values and hold people accountable for their behaviour
- Identify issues or concerns with behaviour or performance early and address them
- Help our people understand the Code and the Council's policies and ensure they have access to resources to help them comply with the Code every day
- Create an environment where employees are comfortable speaking up without fear of retaliation
- Take seriously any concern raised by an employee that compromises the Code and take time to understand if the issue should be escalated. If so, escalate the matter as soon as possible and support any investigation subject to natural justice
- Support the use of Treaty of Waitangi principles - 'partnership, protection and participation', and te reo Māori. This will empower others to support it through their work.

## The Council's responsibilities

- Demonstrate good employer principles and act in good faith towards our employees
- Help our people understand the Code and the Council's policies and ensure they have access to resources to help them live the Code every day
- Ensure safe working conditions and that wellbeing initiatives are in place to support our people
- Provide regular and appropriate communication and feedback about expectations and work performance
- Take seriously any concern raised that compromises the Code and take time to understand if the issue should be escalated. If so, escalate the matter as soon as possible and support any investigation
- Mana whenua and Māori communities participate in decision making and are supported to engage in the work we do
- Te reo Māori is important to the Council and we are committed to putting initiatives in place so our people feel supported in learning and using it.

## Raising concerns

The Council supports honest and open communication and encourages its people to ask questions and report concerns. They will support anyone who, in good faith, discloses actual or suspected breaches of the Code or participates in a Council investigation subject to natural justice. The Council will provide protection to its people if they report a 'serious wrongdoing'. Please refer to the Council's protected disclosures policies for more information.

## Investigations

The Council investigates reports of actual or suspected Code breaches promptly, fairly and in accordance with its legal obligations. Everyone is required to cooperate fully in any Council investigation subject to natural justice, and to keep knowledge of any investigation confidential to safeguard the integrity of the investigation, protect witnesses, and secure relevant information. The Council also protects the confidentiality of the reporting source.

When conducting investigations, the Council seeks fair, well-reasoned outcomes that balance the interests of identifying and addressing misconduct, while preserving the dignity of those involved.

## Disciplinary action

Disciplinary action can involve issuing a warning, or dismissing an employee with or without notice.

Where there is an allegation of serious misconduct or where the health and safety of people is at risk, an employee may be suspended from duties with or without pay until the situation has been investigated by the Council.

The examples of misconduct and serious misconduct in the Code are not meant to be a comprehensive list of actions or behaviours that could result in disciplinary action. The Council may, given the particular circumstance, find that the matter classified in the Code as misconduct may amount to serious misconduct. The examples are not intended to replace staff applying the intention behind the Code rather than literal interpretation.

Consultants and contractors may have their engagement terminated if they breach the Code.

## Misconduct vs serious misconduct

Misconduct can be at two different levels; misconduct and serious misconduct. Misconduct is when an employee does something that may justify some disciplinary action being taken by the Council less than dismissal. Repeated misconduct can however result in dismissal, as can a repeated failure to meet reasonable performance expectations.

Serious misconduct is labelled 'serious' because it can have the effect of destroying or undermining the relationship of trust and confidence between an employee and employer. If, following a fair investigation and disciplinary process, a decision is made that serious misconduct has taken place, a decision may be made to dismiss the employee.



# Tō tātou Kaunihera

## Our Council

Wellington City Council is made up of 15 elected representatives, the Mayor and 14 Councillors.

It's their job to make bylaws, set the city's overall strategic direction, and approve budgets, policies and plans aimed at achieving that direction.

Part of their role is to listen and take the pulse of the community before making decisions.

The elected representatives are supported by our Chief Executive and 1000-plus employees, who provide advice, implement the Council's decisions and look after the city's day- to-day operations.

This section covers some important expectations we must follow to serve our community, customers and the Council of today and the future.

- What it means to work at the Council
- Expectations and performance
- Remaining politically neutral
- Free and frank advice
- Private communication with Councillors
- Media
- Use of Social Media.

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### Our values in action



He tangata, he tangata,  
he tangata

We put people at the  
heart of what we do



Whakapai ake

We're always improving



Mahi ngātahi

We collaborate



Mana tiaki

We care for our places

## What it means to work at the Council

### What it means

Wellington City Council is part of the local government sector which has substantial powers and is responsible for spending public money. Public scrutiny is high, so we need high standards of professional behaviour and to be clear about who is responsible for what.

Given the political environment and the proximity of Councillors, the relationship between employees, contractors or consultants and Councillors has to be clear.

### Why it matters

We may have to make judgements and decisions in difficult or complex situations. Given these decisions can attract political and public attention it's important we understand the environment we are operating in. The Code helps to guide judgement, behaviour, actions and decisions in this political environment.

### How we do it

- We fulfil our lawful obligations to the Council with professionalism and integrity
- We perform our duties honestly, faithfully and efficiently, respecting the rights of the public, colleagues and customers
- We avoid any activities – both work-related and private – that might bring the Council into disrepute or jeopardise its relationships with Councillors, customers or the public
- We avoid offences against the law which may involve a breach of trust or discredit the Council.



Managers and team leaders will consider the following when deciding whether work-related and personal activities may bring the Council into disrepute:

- The nature and circumstances of the activity
- Your position, duties and responsibilities as a Council employee, contractor or consultant
- The consequences of the activity on your ability to fulfil your duties and responsibilities for the Council
- The effects of the activity or its consequences on the Council's relationships with its customers, Councillors or the public.

## Expectations and performance of staff

- We carry out our duties in an efficient and competent manner and comply with all Council policies, standards and guidelines
- We comply with all lawful and reasonable instructions
- We are impartial and use any power or authority we have in a non-exploitative and non-abusive way
- We maintain any requirements for our position such as a practising certificate or drivers licence(s)
- We obtain permission from our manager or team leader in advance if we need to be absent from the workplace during working hours
- We report to work on time and if we can't we let our manager or team leader know.



## Remaining politically neutral

Wellington City Council staff are expected to be politically neutral when performing their role at the Council. It is important not to let personal views or interests influence their advice or behaviour at work.

Staff have the same political rights and freedoms as other New Zealanders. They may stand for office, research and support candidates, and vote as private individuals. However they must remain politically neutral while working with the current Council as well as any future Council. It is important they talk to their manager or team leader if they put in a nomination to stand for office. They may be required to take leave, and if successful, they will need to resign.

Remaining politically neutral maintains the public's trust and confidence in local government and protects staff against any inappropriate political pressure that could be brought to bear on them at work. It doesn't mean staff shouldn't take a personal interest in politics. It means behaviour either at work or outside of work shouldn't compromise their work at the Council. This may be more relevant in some roles at the Council than others.

Political activities, including researching candidates, commenting on issues and attending candidate meetings, should take place in personal time and should not use the Council's resources (including computers and mobile phones). Specific guidelines regarding the conduct of employees, contractors or consultants in an election period will be issued in advance of every triennial election.



### Q & A

Q. Can I join my local residents' association or other community/political groups while I work at Council?

A. Of course, but your activities and contributions to these groups should not affect your ability to do your job. You should think about which groups you join and how you participate in them, and be clear that the views you express are your personal views.

## Free and frank advice

As a Council staff member, we have a responsibility to provide comprehensive, honest, impartial, evidence-based advice to Councillors and to alert Councillors to the consequences, or possible consequences, of particular policies. We provide relevant information and make timely decisions that support the Council's policy.

## Private communication with Councillors

When dealing with personal matters as residents of Wellington, we have the same rights of access to our local authority representatives as other members of the public.

However, given the requirement for Council staff to remain politically neutral in their work, we need to approach such communication with sensitivity.

### As a general guide for staff

- We may communicate privately with Councillors about any matters outside our employment/engagement, but if we occupy a senior position or work closely with Councillors, we should demonstrate particular care with such communications
- We avoid lobbying or influencing Councillors about decisions that fall within Council management, such as the priority of work or allocation of resources. These matters should be raised and resolved within our existing management structure
- We avoid communicating privately with Councillors about matters concerning our employment/engagement or business unit. These matters are to be raised and resolved with our manager or team leader directly or through your representative.

If we are approached privately by a Councillor, we should ensure this is managed and seen to be managed while remaining politically neutral and being impartial. If this happens, always make sure your manager or team leader is informed.

## Media

### What it means

The news media plays a big role in helping keep the public informed about what the Council is doing. At Wellington City Council we speak in one voice when communicating with the media or the public.

### Why it matters

It's important the public receive accurate, clear, complete and consistent information about Wellington City Council.

### How we do it

- Only staff who are authorised and trained should represent the Council when communicating with the media
- We use designated spokespeople to speak to the media
- We refer any media calls or contact to the Council's Media Team
- We only comment on existing policy and practice that has been resolved by Council. We only comment on issues or activities relating to our area of responsibility
- We don't give our personal opinions to the media, or any other group or organisation seeking information on Council policy.

### Examples of misconduct

- Making unauthorised statements to the media or public about work-related matters
- Commenting to the media or public on unresolved policy matters of political debate
- Commenting on requests that are outside of our responsibilities
- Giving our personal opinions on Council policy to the media.

### Examples of serious misconduct

- Unauthorised disclosure of commercially sensitive information
- Making unauthorised comments that undermine the Council and/or bring it into disrepute.

### For more information

- Please refer to our media policy and protocols.



### Q & A

**Q.** I've received a call from the media about the budget implications/costs for a high profile project I've been working on. My manager has received media training and would normally comment. They are away. Can I make a comment on their behalf?

**A.** No. Only designated spokespeople who have received media training can communicate to the media. Refer the media call to the Media team.



## Use of social media

### What it means

Social media includes any digital communication channels that allow individuals to create and share content and post comments online. The use of social media is extremely common and we assume the Council's staff use social media in their personal lives.

Working for the Council means staff need to be mindful of what they choose to post or share – even if it's their personal opinions and on their personal channels.

### Why it matters

We need to be aware of and comply with all Council policies in our use of social media.

What we say on social media, even in a personal capacity, can impact the way others view the Council as an organisation. Good judgement needs to be used when making comments online that are public. People need to be polite, respectful and remain neutral and impartial if commenting on Council issues.

### How we do it

- We are mindful of what we create, share, post and comment on, remembering the internet is a public place and we can't control how long something will remain on the internet, or other people's access to the content
- We speak to the Media team if we see anything we don't think is right on the Council's social media channels. Do not use your personal account to comment
- As members of the public, we can engage on the Council's social media channels, but keep it positive.

### Examples of misconduct

- Publishing unauthorised Council material or comments about the Council on social media
- Expressing opinions on social media that contradict the Council's position while identifying yourself as working for the Council.

### Examples of serious misconduct

- Bullying or harassment other Council staff on social media
- Bringing the Council into disrepute through social media activity.

### For more information

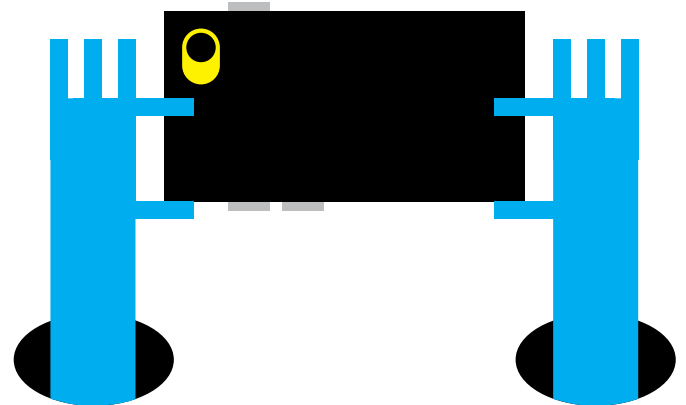
- Please refer to our social media policy and our ICT Policy Handbook.



### Q & A

**Q.** I'm part of a social media community group for the suburb I live in and we are upset about the stance the Council is taking on a particular issue. Can I post my views on behalf of the group on the Council's social media channels?

**A.** No. Because you work for the Council, you need to remain neutral and impartial when posting on Council social media sites. Contact the social media team for guidance on what other channels you can use.



# Ō mātou tāngata

## Our people

People are at the heart of everything we do and are the lifeblood of our organisation.

Our people's ability to lead, create and innovate is critical to our success.

We are continuing to build a constructive and high performing culture where we are safe, empowered, supported and encouraged to be our best.

We are all entitled to be treated with fairness and respect. We invite inclusive conversations to create the best possible outcomes for everyone involved. By working together, we can unlock an even brighter future for ourselves and the organisation we serve.

This section covers some important expectations we must follow to support each other and sustain an environment in which we all can be successful.

- Safety, security and wellbeing
- Preventing harassment and bullying
- Conflicts of interest
- Diversity and inclusion.

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### Our values in action



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## Safety, security and wellbeing

### What it means

The Council is committed to the safety, security and wellbeing of staff. This is done by reducing, or where possible, removing the risk of harm to staff and the public. This includes employees, contractors or consultants, volunteer workers and visitors.

At the Council, everyone takes responsibility for their health, safety and wellbeing and that of others. Through our Health and Wellbeing Strategy, the Council enables its staff to be proactive and take responsibility for their health and wellbeing.

### Why it matters

Keeping people safe and healthy, supporting rehabilitation and providing appropriate resources is the right thing to do as it promotes a positive, caring work environment in which to work.

We must perform at our best every day. Therefore each of us must report to work free from any substance, including alcohol or drugs, that could prevent us from doing our jobs safely, or that could create a dangerous situation.

Acts of violence, threats and physical intimidation have no place at Wellington City Council.

### How we do it

- We all share the responsibility to make health and safety a daily priority. Each of us is accountable for observing the health and safety policies and practices that apply to our job and for taking precautions necessary to protect ourselves, each other, our contractors and our visitors
- We work together in the spirit of the Council Worker Participation Agreement to achieve positive health and safety outcomes
- We are all made aware, and remain vigilant of the hazards and associated risks to the health and safety of our people, contractors or consultants, volunteer workers, visitors and the public, with a particular focus on our critical risks
- We take reasonable steps to control these hazards to ensure any risk to people in our workplaces is eliminated or reduced as much as possible
- We know what to do in an emergency and cooperate and comply with Council instructions during emergencies
- When an incident does occur, we report it so it can be investigated and we can learn from it
- We take a prevention before cure approach to our health and wellbeing needs
- We talk to a manager or team leader if we see anyone who may be under the influence of alcohol or drugs while at work

- We understand that for safety and protecting our assets, closed-circuit television and access control cards information is collected about our movements as we move about Council buildings and facilities or if we are in a location where CCTV operates
- We ensure only authorised people access Council premises
- Council premises that require access cards need to be displayed as a form of identification at all times while we are at work
- We never use our access cards or keys to grant access to our premises to people we don't know unless we have been authorised to do so.

### Examples of misconduct

- Breach of the Council's smoke-free workplace policy
- Behaving in a way that is contrary to any of the Council's safety policies, procedures, or practices.

### Examples of serious misconduct

- Consumption, supply or possession of illegal drugs on Council property or any other workplace
- Assisting any person to gain unauthorised entrance to any part of Council premises
- Violence or threats to other employees, customers or others in the workplace
- An act of negligence or unsafe practice that seriously affects (or has the potential to seriously affect) security or health and safety in the workplace
- Being unable to perform duties to the required standard because of consumption of drugs or alcohol.

### For more information

- Please refer to the Council's Health and Wellbeing Strategy, Drug and Alcohol Policy, Security Policy, Rehabilitation Guideline, Council Worker Participation Agreement and Critical Safety Risks.



### Q & A

- Q. I work in a role that requires the use of a Council vehicle. My doctor has prescribed medication that may cause certain side effects, such as drowsiness. Do I need to tell my manager or team leader that I'm taking this medication and the possible side effects?
- A. Yes. Staff who for medical reasons are using prescription or non-prescription drugs that may impair alertness or judgement – and could jeopardise their safety and that of other people – should inform their manager or team leader straight away.

## Preventing harassment and bullying

### What it means

We continuously strive for a work environment in which our people are treated with dignity and respect, and that is free of harassment, bullying and discrimination.

### Why it matters

We believe everyone should be treated with respect. A work environment free from harassment, bullying and discrimination enables us to grow and thrive together.

### How we do it

- We are conscientious about how our actions and comments might be perceived or misunderstood by others
- We have zero tolerance for unwanted verbal or physical conduct (sexual or otherwise) or degrading and disparaging jokes related to race, colour, age, gender, sexual orientation and other categories protected by the law
- We report instances of harassment or bullying to our manager or team leader, the Human Resources team, Legal and Risk team, any member of our management team, or your Health and Safety representative.

### Examples of misconduct

- Interfering with, obstructing, or hindering the work performance of another staff member
- Disparaging comments, slurs, jokes.

### Examples of serious misconduct

- Unwelcome sexual advances or remarks
- Displaying, downloading or storing written or graphic material that ridicules, insults or shows hostility toward a group or individual, including racist, pornographic, obscene, or sexually suggestive content
- Making malicious or unfounded allegations against other employees, customers or others in the workplace
- Harassment or bullying of Council staff, customers or others in the workplace either physically, verbally, in person or via communication including social media.

### For more information

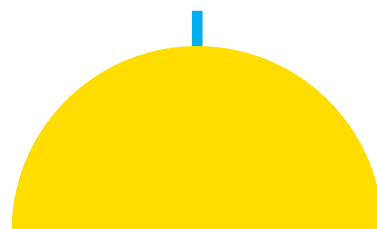
- Please refer to Wellington City Council's Anti-Bullying Policy and Harassment Policy.



### Q & A

**Q.** I can tell my colleague is upset by another person on our team who tells jokes of a sexual nature. I'm not bothered by them. Should I just wait for my colleague to say something?

**A.** Sexual harassment can be directed toward a person of the same or opposite sex. If it's clear to you that these jokes are offensive to your colleague, step up and encourage them to speak to this person to let them know their humour isn't welcome. If your colleague is reluctant, then inform a manager or team leader about the situation or talk to the Safety, Security and Wellbeing team.





## Conflicts of interest

### What it means

Conflicts of interest are very common and occur frequently. The nature of working for the Council, and living in a small city like Wellington, means that conflicts do happen for Council staff. We all have interests in our lives outside of work.

A Conflict of interest can be an actual conflict, a perceived conflict or a potential conflict. An actual conflict is a situation that creates a conflict of interest. A perceived conflict of interest is where others may think, or may reasonably think, you might have a conflict of interest. A potential conflict is something that has not yet occurred but there is a reasonable risk it will happen, and if so it would create a real or perceived conflict of interest.

### Why it matters

It's important we balance personal interests with our role and responsibilities for the Council. If we don't, it can create a risk for the Council's role in the community. The community may be concerned that their interests are not being managed fairly, that inappropriate considerations are being taken into account in the Council's decision-making processes or inappropriate preference is being given.

### How we do it

- We think about what interests we have in our personal lives and how these might overlap or interact with our role and responsibilities for Council
- We disclose where we have interests that may impact or interact with our role or responsibilities at the Council.

### Examples of conflicts of interest

Personal	Where you could gain a benefit or advantage, or have your action interpreted as getting personal gain or benefit (this can be financial or non-financial) comments or where your employment outside of the Council may conflict with your employment at the Council.
Family and friends	Where you have an opportunity or are pressured to assist, or provide an advantage to family or friends. Your family includes your spouse, partner, parents, in-laws, children, siblings, aunties, uncles, first cousins and other relatives that you have (or would be assumed to have) a close relationship with. Your friends include close friends and other friends you would be (or would be seen to be) loyal to, such as flatmates and business partners (past and present).
Community or voluntary interests	Where you have an opportunity or are pressured to assist, or provide an advantage or benefit to, a stakeholder or people in a community with which you are involved; or voluntary interests that may conflict with your employment at Council.
Business interest	Where you have a business interest or trusts in an organisation that could come under local/regional authority, oversight or involvement with Council.  Where you are a director, owner, or partner of, or have significant shareholdings (e.g. equal or greater than 20% shareholding) or investments in, an organisation that could come under local/regional authority, oversight or involvement with Council.
Gifts or benefits	Where receiving a gift (outside of what's contained in our gifts policy) and/or benefit that may create a conflict of interest. How to deal with gifts is covered in our discretionary expenditure policy and gifts policy.

It is likely that, at some point (now or in the future), you may find yourself in situations where you have a personal interest that does or may conflict with the work the Council does, or is involved with.

Even if you believe you have dealt with the situation in the appropriate manner, you must advise your manager or team leader. With conflicts, perception (how it looks) is as important as reality (what actually happens). If you don't disclose a conflict of interest it could be perceived that as an attempt to conceal it, and this may lead to your integrity being called into question.

To safeguard yourself against allegations of improper behaviour you need to recognise when an actual or potential conflict of interest arises. If you are unsure ask your manager or team leader, and disclose it.

There are a few situations where you will need to disclose any potential conflict of interests to Council:

When you join the Council	When you join Council we ask that you disclose any conflicts of interest.
When there is a meaningful change	Tell us when there has been a 'meaningful change' in something you have already disclosed.
When your situation changes	If your situation changes and you become aware of a conflict of interest which does or might conflict with your duties at Council.
When asked	You will be required to complete and submit a conflict of interest declaration on a regular basis, e.g. annually, even if there are no new/changed conflicts of interests to disclose.

When a conflict of interest disclosure has been made, the manager or team leader must carefully consider whether there is a potential conflict of interest and, if so, how to effectively manage the situation. The appropriate steps will be determined by the relevant manager, in consultation with the legal team as and when required. Steps may include restricting or prohibiting involvement in work activities that are linked to the Conflict of Interest.

#### Examples of misconduct

- Not disclosing a potential conflict of interest
- Not disclosing a relevant change in circumstances.

#### Examples of serious misconduct

- Failure to remedy a conflict of interest as directed by the Council
- Accepting bribes
- Making decisions on behalf of the Council for the benefit of the staff member or their family, friends or acquaintances.

#### For more information

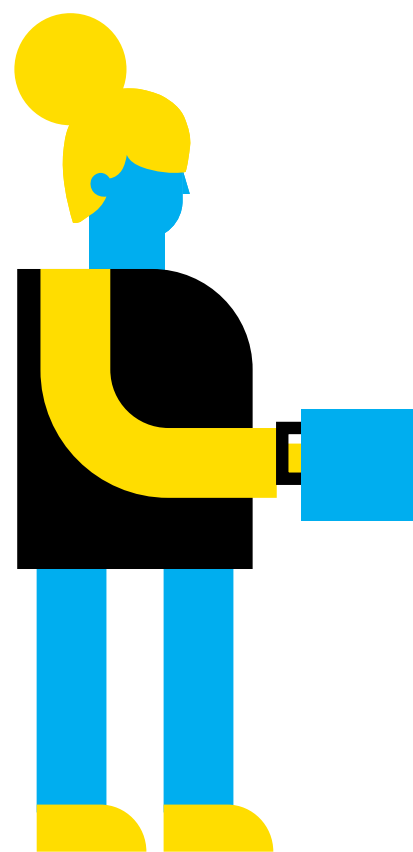
- Please refer to our Conflicts of Interest documents and checklists.



#### Q & A

**Q.** A builder I know has asked me to assist him getting his consent applications fast-tracked. This would mean he could start working on my house repairs sooner. I am thinking about having a chat with a colleague in the Building Consenting and Compliance team to see if they could attend to the applications sooner. Is it ok to do this?

**A.** No. If you were to do this you would be breaching our conflicts of interest's policy by using your position for personal gain, compromising your integrity and placing yourself and potentially your colleague in an actual conflict of interest situation.



## Diversity and inclusion

### What it means

The Council embraces and values diversity and inclusion so all staff are supported to thrive and grow as they work together for Wellington's future.

### Why it matters

The Council believes diversity of people and ideas inspires innovation, provides key insights into the communities we serve, and enhances the success of our organisation.

### How we do it

- We treat each other with dignity and respect, and foster an atmosphere of open, direct and inclusive communication
- We create a safe environment where our people feel comfortable at work, feel their opinions are valued, and can speak without fear.

### Examples of serious misconduct

- Breaching the Human Rights Act 1993 in the undertaking of the staff members' duties.

### For more information

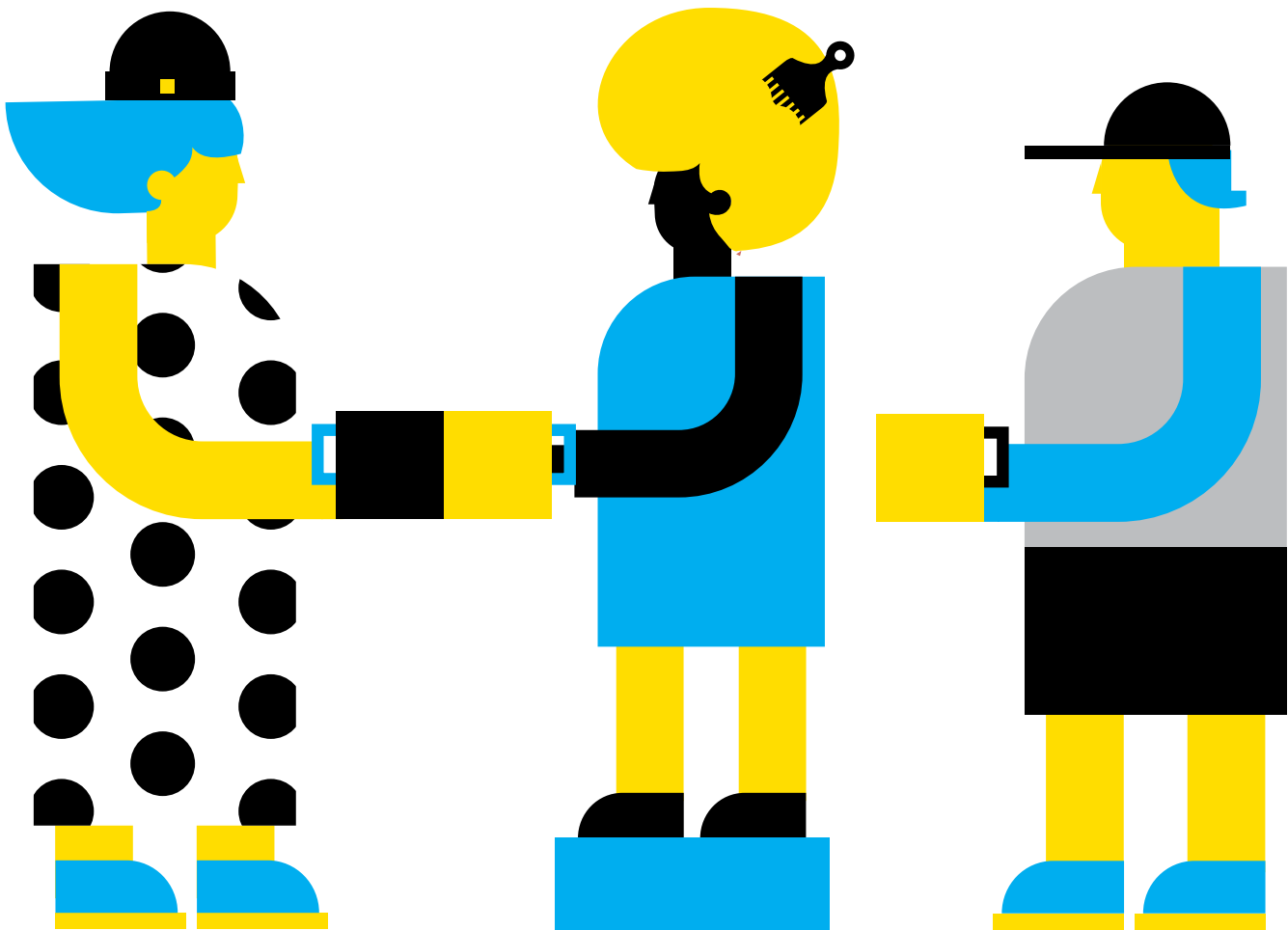
- Please refer to Wellington City Council's Diversity and Inclusion Strategy Mō te katoa and Page 24 in this Code on respecting personal information.



### Q & A

Q. I'm considering an applicant for a job who would be working directly with customers, but I'm afraid our customers will be uncomfortable with their physical disability. Is this a reason not to hire them?

A. No. To deny an applicant or employee a job based on a reaction of others to a disability, race or other characteristic is unlawful discrimination. If the applicant is the best qualified person for the job, we should hire them. At Council we respect and value all people for their diverse backgrounds, experiences, approaches and ideas.



# Ō mātou kiritaki, hāpori, hoa kaipakihi

## Our customers, communities and the environment

At Wellington City Council we put our customers first.

We seek to actively engage with our communities so we can capture a broad range of views that can be used to help shape our city's future.

We identify ways we can be sustainable and minimise our impact on the environment.

This section outlines expectations for providing the level of service and engagement our customers and communities expect.

- Our customers
- Our communities
- Protecting our environment.

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### Our values in action



He tangata, he tangata,  
he tangata

We put people at the  
heart of what we do



Whakapai ake

We're always improving



Mahi ngātahi

We collaborate



Mana tiaki

We care for our places

## Our customers and communities

### What it means

We are a service-based organisation, and our customers and communities are at the heart of the services we provide.

Our customers and communities have strong voices that need to be heard to inform the Council's decision making. When we engage them on decisions, we look for ways to make sure we hear a broad range of views.

### Why it matters

The people of Wellington are at the heart of the Council's priorities and plans. We provide a range of services on behalf of Councillors who are elected by the people of Wellington. The way we deliver these services, either ourselves or through business partners, impacts the public perception of the Council.

### How we do it

- We understand we are representing the Council when we are engaging with our communities, and we are careful not to present our personal views
- We respond appropriately and are aware of, and sensitive to, the needs of Wellington's diverse communities and how they wish to engage with the Council. We engage in a respectful and meaningful way so the community is clear about what it can influence and knows its interests have been considered in the process
- The Council recognises that dealing with customers may be challenging. The Council will support customer-facing teams so they have the tools and strategies to manage difficult customers
- We do what we say we will do by the time we say we will do it
- We keep our customers informed if we can't resolve an issue. We explain to our customers why we are passing the issue to somebody else
- When we get something wrong, we apologise and we fix it
- The Council supports and resources customer-facing teams to resolve service requests and complaints.

### Examples of serious misconduct

- Deliberately misrepresenting or excluding community groups in Council activities that impact them
- Being disrespectful to customers and demonstrating behaviours that impact negatively on the reputation of the Council.

### For more information

- Refer to our Standard for Delivering Excellent Customer Service.

## Protecting our environment

### What it means

We realise the importance of what our environment provides, and protect it for future generations. We will ensure our environment is healthy and resilient.

### Why it matters

Mana tiaki – we care for our places.

The Council has a shared responsibility with Greater Wellington Regional Council to maintain a healthy environment as we are the guardians of our city's environmental assets.

Our environment contributes to the health and wellbeing of our community.

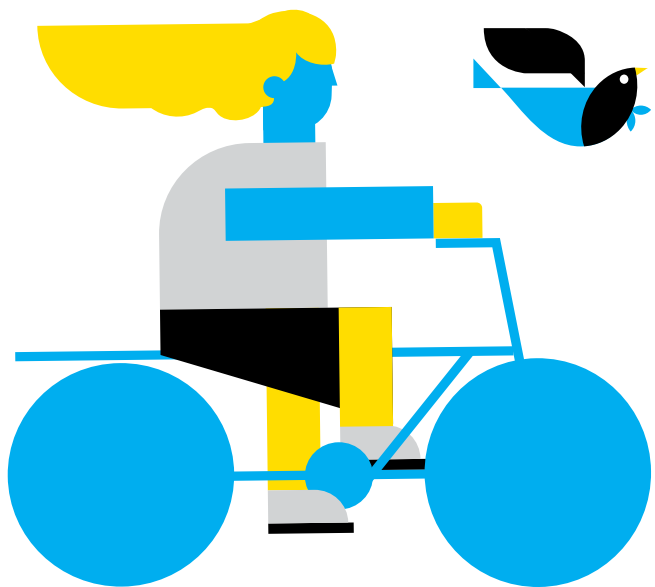
There is intrinsic value in biodiversity and for many, particularly Māori, it is an essential part of their world view.

### How we do it

- Everyone is accountable for observing environmental laws and Council policy
- We support the city's goals to reduce carbon emissions, and think about impacts of climate change on the city and the Council
- We will ensure our actions and operating practices do not adversely impact the environment. We consider the environmental impact of everything we do, including actions that other parties take on our behalf (e.g. contractors).

### Examples of misconduct

- Negatively impacting the environment through the irresponsible disposal of harmful waste.



## Ō mātou rawa

### Our assets

We need to be innovative and professional to deliver the initiatives we've committed to. This includes making better use of, and creating more value from, our existing assets.

The public, our communities and Councillors put their trust in us to deliver, perform and create long-term value for Wellingtonians.

We can maintain that trust through the way we communicate and how we protect our information, systems, property and equipment.

This section covers some important expectations we must follow to protect our assets.

- Council assets
- Respecting personal information
- Managing Council official information
- Using Council systems and equipment responsibly.

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#### Our values in action



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Mana tiaki

We care for our places

## Council assets

### What it means

The Council's assets are all the resources we use to deliver the Council's plans and policies. Everyone has a responsibility to protect the Council's assets. It's also important we are financially prudent and careful not to waste ratepayers' money.

The table below provides examples of the type of assets we have here:

#### Physical assets

Physical assets include anything physical we use to conduct our business - from photocopiers, stationery and computers to lawnmowers, lane ropes and inflatables. The land, buildings, vehicles and inventory the Council owns or has interests in are also physical assets.

#### Intellectual assets

Intellectual assets include the Council's ideas, improvements, inventions, processes, written documents or other forms of intellectual property, designs, copyrights and licences.

#### Information assets

Information assets include any data, CCTV footage, and confidential information relating to the Council's business, no matter how it is created, distributed, used or stored. This includes data in our files and on our servers.

#### Financial assets

Financial assets include purchasing cards, petty cash, air points, money or anything that can be converted to money, such as property.

### Why it matters

The Council's assets are essential to running our organisation successfully.

We all share the responsibility to be good stewards of these assets on behalf of our ratepayers and communities, taking care to avoid loss, damage, waste and improper use.

### How we do it

- We protect Council assets and use them responsibly
- We adhere to our delegated financial authority (DFA)
- We never alter financial documents such as cheques, invoices or timesheets
- We use Council funds responsibly with honesty and integrity and are accountable for our expenditure
- We follow financial processes or seek advice from the Finance team on the best course of action to take regarding financial transactions before incurring the financial obligation
- We don't disclose anything we are developing as part of our job that forms part of the intellectual assets of the Council unless we are authorised by a tier three manager to do so.

### Examples of misconduct

- Consistently missing deadlines for the coding of Purchasing card transactions or splitting financial transactions to meet expenditure policy limits
- Miscoding or incorrect descriptions of transactions within the financial management system or approving or incurring financial transactions outside of DFA
- Breaching copyright including unauthorised use of Council Intellectual Property material
- Being careless with Council property, tools and equipment
- Using Council resources or equipment for personal benefit or otherwise without prior authorisation.

### Examples of serious misconduct

- Committing or participating in dishonesty against the Council, including (but not limited to) misappropriation of funds, submission of false expense claims, invoices, or alteration or falsification of Council records
- Concealment of information that could have a significant impact on the Council's finances or ability to do business
- Misrepresentation of transactions or financial results to achieve performance objectives
- Obtaining personal benefit from using Council resources by incurring or authorising transactions where you receive or are perceived to receive some personal gain or benefits such as using a Council purchasing card for personal use
- Unauthorised disclosure of commercially sensitive information.

### For more information

- Please refer to Council policies, including petty cash, delegations, purchasing cards, expenses reimbursement, capital and operating expenditure, credit control and debt management, travel and accommodation.



#### Q & A

- Q. While on a business trip next week, I plan to take my sister out to dinner for her birthday. Can I put the cost of her meal on my purchasing card and then reimburse the costs when I complete my reconciliation?
- A. No. You can use your purchasing card for your portion of the restaurant bill, but the portion of the bill considered a personal expense (your sister's meal), must be paid directly by you.

## Respecting personal information

### What it means

Wellington City Council collects, uses, and stores personal information about employees, business partners, customers, and other members of the public. It may include contact details, health information, camera footage and financial information. We respect the privacy and confidentiality of this information by not disclosing it to anyone, internally or externally, except where we are legally permitted to do so.

### Why it matters

He tangata, he tangata, he tangata - it is people, it is people, it is people.

Transparent and respectful handling of personal information, both that of our external customers and the Council's staff, is an important part of how we can demonstrate our value of putting people at the heart of what we do. Good privacy practice is good customer service.

### How we do it

- We follow all privacy laws and Council privacy policies, procedures and guidelines
- We only collect personal information if we need it
- We tell people what we are going to do with the information
- We take care of the information once we have it by keeping it secure
- We allow people to see their personal information if they request it
- We make sure personal information is accurate and up-to-date before we use it
- We only share or disclose information if we have legal grounds to do so, otherwise we use it only for the purposes we collected it for
- We retain it only for as long as is necessary, guided by our information retention schedule.

### Examples of misconduct

- Deliberately sharing, or using personal information for another purpose to what it was collected for, without appropriate authority
- Failure to report privacy breaches or complaints
- Failure to respond to requests for personal information within the required timeframes.

### Examples of serious misconduct

- Deliberately disclosing personal information without appropriate authority, knowing it is not the right thing to do.

### For more information

- Please refer to Wellington City Council's Privacy Policy, procedures and guidelines.



### Q & A

**Q.** A colleague has had an operation. A supplier who knows them well has asked for their personal address details so they can send them a card and flowers. Can I provide this information?

**A.** No. We need to show commitment to respecting the privacy of personal information by not disclosing address information. We don't have the permission of our colleague to disclose this information to the supplier.





## Managing Council official information and data

### What it means

When we create information or data, or receive it from the public or other agencies, it becomes a public record.

We have responsibilities under The Public Records Act 2005 (PRA) to look after these records, to ensure they are stored correctly, are accessible, and are either archived or destroyed appropriately once they are no longer in use.

The public has the right to request access to the information we hold. This is allowed under the Local Government Official Information and Meetings Act 1987 (LGOIMA) or the Privacy Act 1993. In most cases, the decision to provide information is easy because it is publicly available information, for example building consents, resource consents and most reports to committees.

In some cases, public access to specific types of information can be withheld – for example, personal information, commercially sensitive information or advice that is subject to legal professional privilege.

### Why it matters

The Council needs to manage information consistently to achieve its business objectives and meet legislative and administrative requirements. The Public Records Act sets out our obligations about record keeping and destruction. The LGOIMA sets out our responsibilities about the release of information, including what information may be withheld, Land Information Memorandum (LIM reports) and timeframes for notification of public meetings.

### How we do it

- We share information internally in a collaborative way
- We create full and accurate records of activities, transactions, and decisions carried out during daily business activities
- We ensure electronic records are maintained by saving them into the Council's central electronic document management system or other approved electronic system
- We capture information and data using the appropriate processes and tools
- We prevent unauthorised access to records
- We ensure no records are destroyed or removed unless permitted by a current disposal authority from City Records
- We are careful about the way we share information with Councillors and the media
- We never use Council information or data for illegal or unethical activities, or in ways that are contrary to this Code, or Council policies, guidelines or procedures
- We ensure all electronic communication including instant messaging, texts and email are always professional and accurate. There are no grounds under LGOIMA for withholding information where a Council employee, contractor or consultant has been less than professional in their language or comments

- We think about whether information we hold is confidential for any reason, and manage it accordingly
- We always give accurate information and make true declarations. We consistently follow workplace procedures for documenting decisions for action and the reasons for taking those decisions
- We ensure that all legislative and Council requirements for managing, using or creating information are upheld.

### Examples of misconduct

- Accessing our business files for personal use, or for friends and family
- Preventing other staff from viewing information without good reason
- Keeping business records on a USB drive or other unsecured, portable storage device
- Purposefully misfiling information
- Disclosing information carelessly.

### Examples of serious misconduct

- Making or permitting a false record to be made relating to any material or work
- Knowingly giving false information or making false declarations
- Unlawfully withholding or destroying information
- Allowing or assisting unauthorised access to Council information, including by Councillors
- Unauthorised disclosure of restricted-access information
- Unauthorised possession or retention of Council information for malicious purposes
- Actively accessing secured records
- Disclosing information for personal gain
- Disclosing information in breach of an obligation of confidence.

### For more information

- Refer to our Information Management Policy, procedures and guidelines.



### Q & A

**Q.** A customer has asked for a copy of a letter they believe their neighbour has sent to the Council complaining about their unfenced spa pool. Should you give the customer a copy of the complaint letter?

**A.** In most cases – no. Generally, we rely on the public to be our 'eyes and ears' and they should be able to report concerns confidentially without the risk of being identified. Our regulatory officers can then investigate any potential risks to the health and safety of the public.

## Using Council equipment and systems applications responsibly

### What it means

We must use Council equipment and information technology (IT) systems responsibly.

Our equipment and systems include mobile devices, desktops, laptops, tablets and networks.

Our equipment and systems are the property of the Council, as is communication shared over these systems, such as email, voicemail, social media, instant messages, recordings, texts or instant messaging.

### Why it matters

We need to protect Council systems and data from accidental or unauthorised disclosure, misuse, improper alteration or destruction through our security controls and information management policies.

### How we do it

- We are responsible for any actions that occur under our username
- We rigorously protect our usernames and passwords
- We never use Council systems or equipment (including email, instant messaging, the Internet or Intranet) for illegal or unethical activities, or activities otherwise contrary to this Code, or to Council policies, guidelines or procedures
- We are allowed limited personal use of company phones, computers, photocopiers and network bandwidth provided it does not interfere with our productivity, place Council information at risk, place the Council at risk of liability, incur significant additional costs to the Council or reduce the value of Council assets.

### Examples of misconduct

- Sharing your username and passwords with other people
- Using Council equipment for online gambling or games.

### Examples of serious misconduct

- Inappropriate use of email – for example offensive or inappropriate images or text
- Theft or unauthorised possession or removal of Council, clients' or others' property
- Defacing, damaging or destroying Council or another staff members property
- Viewing or distributing pornographic, obscene, offensive, defamatory, harassing or discriminatory content.

### For more information

- Please refer to our ICT Policy Handbook, guidelines and procedures.



### Q & A

Q. I've given my password to our team coordinator so they can approve some purchase orders on my behalf. Is this o.k?

A. No. Never share your password with anyone. And don't allow others to approve the use of Council funds, or assets on your behalf, especially if they don't have the correct level of delegation themselves.

## Document Control

Review period	Biannually
ELT Sponsor	Nicola Brown

	Date	Preparer	Reviewer	Approver	Primary Ownership	Caption
1	17/01/19	Lisa Attwell	Paku Edwards /Jonny Mackenzie	ELT Policy Working Group recommend that ELT approve the Code of Conduct	BU: Human Resources – Code of conduct approved	Code of Conduct approved

Next policy review date	20 February 2021
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