



Business Ethics Policy

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Business Ethics Policy

1. Introduction

Employees of Transport for London (TfL) are expected to deal with customers, contractors, suppliers, colleagues and the public with the highest degree of integrity. This will be achieved by adopting responsible business practice and operating ethically in the interest of the public. Ethical behaviour is an individual and organisational requirement.

2. Organisational Scope

Employees of TfL, Docklands Light Railway Limited, Rail for London Limited, London Bus Services Limited, London Buses Limited, Victoria Coach Station Limited who are on TfL employment contracts (Paybands 1-5 and Directors) and those staff on predecessor organisation employment contracts where the individual has transferred to the employment of TfL.

3. Policy Statement

TfL aims to build good relationships with employees, partners, suppliers and the community. In helping to build these relationships, TfL expects employees at all levels to behave with the highest standards of integrity.

4. Requirements

As a public body organisation, employees should conduct themselves with integrity, impartiality and honesty. Employees must not use their authority or position for personal advantage or against TfL's public interest. In particular, all employees should:

- handle internal and external business affairs with complete integrity without reference to personal interest
- inform line managers in writing if they have any personal interest that might affect, or could be seen by others to affect, their impartiality in dealing with customers, suppliers, contractors or members of the public or in discharging the responsibilities of the role
- ensure orders and contracts are awarded on merit, in fair competition against other tenders, and that no special favour in the tendering process is shown
- maintain the standards of service and professional competence relevant to their role, exercise a proper level of control to prevent shortfalls, and support others to do likewise



- reject any business practice which might reasonably be deemed improper
- follow the letter and spirit of the law, guidance from appropriate professional institutions or bodies, good business practice and contractual obligations
- comply with all financial agreements entered into with TfL
- not deceive or knowingly mislead customers, the public, the Board or colleagues
- deal with members of the public sympathetically, efficiently, promptly and without bias
- inform line managers at the earliest opportunity if any part of this policy has been breached

Employees must be aware:

- that third party approaches for information, either verbal or written which may be classified as confidential must be referred to their manager
- of the implications of information getting into the wrong hands through bad housekeeping
- that steps will be taken in the event of any breach of this policy

Confidentiality and accuracy of information

- Employees should not disclose sensitive or confidential information about TfL, other than that required by the normal course of their work, unless expressly authorised to do so, in writing, by their manager.
- Employees should not use any confidential information, whether technical, commercial, financial, personal or other, for personal gain or against TfL's interests, or pass it on to others who might use it in this way. All information provided must be true, fair and not designed to mislead.
- It is essential to create an open and accountable environment in which employees feel able to raise concerns internally without fear of disciplinary or any other action being taken against them as a result of any disclosure, and be assured that an investigation will take place.

Lectures, broadcasts and publications

- Employees are encouraged to contribute to, or participate in, external discussions or publications to increase their professional or technical knowledge.
- When doing so, statements should not be made on subjects which are not yet public knowledge, or views expressed in a way which might suggest they are official policy, or refer to possible or actual decisions



in a manner likely to cause misunderstanding or bring TfL into disrepute.

- Managers should always be informed of any planned activity in this area.

Further standards appropriate to specific types of work may apply, as well as for employee conduct in the run up to local and general elections and employees should refer to the procedures within their directorate and on Source for more information.

Contact with the media

When communicating with the press or media on TfL's behalf, employees must refer to the relevant press office. Employees are not permitted to speak to the press or other media without permission of the line manager or the press office.

Records and instructions

Employees must ensure that any records and accounts for which they are responsible are truthful, accurate, complete, up to date, compliant with legal and any other relevant regulations and Standing Orders and suitable to be a proper basis for informed management decisions.

Employees must observe all accounting and other relevant instructions when dealing with money, credit cards etc, or handling items of potential value such as tickets and lost property.

Business gifts, tips and hospitality

- tips from customers are not to be accepted
- unless stricter rules apply locally, modest business lunches and gifts from work contacts are acceptable. Employees should refer to guidance and procedures applicable to their area.
- where there is uncertainty about whether to accept gifts or hospitality employees should decline or seek the view of their manager and obtain confirmation in writing

Any conflict of interest employees may have in dealing with a supplier or offer of a gift or hospitality arising from business activities should be discussed with line managers.

Public Interest Disclosure Act 1998:

The Act 1998 gives legal protection to employees against being dismissed or penalised as a result of publicly disclosing serious concerns. Where an individual discovers information believed to show malpractice or wrongdoing, this information should be disclosed without fear of reprisal. Further



information on public disclosure can be obtained from the 'Whistleblowing' policy.

5. Support and Advice

Support and advice can be obtained through speaking to your manager or by contacting HR Services.

6. Ownership and Review

TfL Group Employee Relations and HR Policy

7. Related Documentation

Employees are encouraged to look at this policy in conjunction with:

TfL's Employment Policy

Code of Conduct

Business Expenses Policy

Discipline at Work Policy

Whistleblowing Policy

Handling Employee Data

Conduct in the run up to local and general elections – legal guidance