

Policy

P078 A9

TfL Code of Conduct

1 Purpose

This Code of Conduct describes TfL's ethical values and vision, sets out the behaviour that is expected of all employees and identifies policies that are relevant to the conduct of business.

Transport for London (TfL) strives to conduct all its activities efficiently, to the highest ethical standards and in compliance with its legal obligations.

TfL can only realise this ambition through its employees and it is therefore essential that all personnel conduct themselves according to the highest standards of behaviour, in the most professional manner and with a commitment to perform their work to the best of their ability.

2 Scope

The requirements of this Code apply to all Board Members and Advisers, employees of TfL and its subsidiary companies; and employees of agencies and consultancies contracted to carry out work for TfL. Throughout this Code, unless otherwise explicitly stated, the terms TfL, employee(s) and TfL employee(s) include all those covered by the Code.

3 TfL's ethical values and vision

TfL aims to conduct its business with honesty and integrity and expects employees to maintain the highest ethical standards. TfL recognises the obligations it has towards the community as a whole, its employees, its partners, suppliers and all others with whom it interacts.

TfL seeks to fulfil those obligations according to the original principles laid out in the Nolan Report on standards of behaviour in public life. These principles are set out below. They apply to all employees and it is expected that they will uphold these principles in their roles.

3.1 The Nolan Principles

3.1.1 Selflessness

Employees of TfL should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family or their friends.



3.1.2 Integrity

Employees of TfL should not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.

3.1.3 Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, employees of TfL should make choices on merit.

3.1.4 Accountability

Employees of TfL are ultimately accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

3.1.5 Openness

Employees of TfL should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

3.1.6 Honesty

Employees of TfL have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest. Any conflict must be notified in writing to TfL and updated as appropriate.

3.1.7 Leadership

Employees of TfL should promote and support these principles by leadership and example.

4 Business conduct

4.1 TfL's commitment

TfL will manage its business according to its ethical values, to the highest standards of integrity, behaviour and business practice. TfL will work with others in a spirit of co-operation and will develop relationships based on honesty, fairness and mutual trust.

TfL is committed to developing and implementing world class transport facilities for the public. In pursuit of this goal TfL commits to treating all those who use London's transport facilities equally and with due consideration. TfL will ensure that the public's health and safety is its first priority. TfL believes in sustainable development and seeks to meet the needs of the present without compromising the ability of future generations to meet their own needs.

The behaviour of TfL's employees is central to how it conducts its business. TfL will ensure the resources are in place to enable employees to realise the delivery of services in line with its ethical values and vision. In particular TfL will aim to be an



employer of choice through the creation of a positive, responsible, innovative, open and challenging working environment in which ability and delivery is valued, encouraged, developed, recognised and rewarded.

TfL will protect the integrity, availability, and confidentiality of all personal and corporate information held by TfL in either manual or electronic form.

TfL is committed to equality and inclusion in all its employment practices, policies and procedures. TfL employs a talented and diverse workforce and will help all employees to develop their potential both personally and professionally and to learn from shared experience. TfL will provide a safe and healthy environment for its workforce.

4.2 The Employees' Commitment

All employees must respect and encourage TfL's ethical values and vision set out above, the principles in this document and all policies. It is the personal responsibility of every TfL employee, and anyone else who is conducting business on TfL's behalf, to act in accordance with this Code and the policies which underlie its content. This Code, an employee's own contract of employment, and policies and guidance set out the standards expected.

4.3 Employees' general conduct

Employees are required to behave with a high standard of integrity in business and commercial relationships and treat colleagues and anyone with whom TfL has dealings fairly, with respect and dignity.

All employees must comply with all policies, standards and supporting guidelines, working procedures and safety instructions relevant to their job. For example, TfL operates policies covering the following key matters:

- a) Discipline
- b) Grievance
- c) Bullying and harassment
- d) Attendance at work
- e) Data security and
- f) Performance improvement.

This list is not exhaustive. All policies can be found on the intranet, and are updated regularly but policies and procedures are not of contractual force. Employees have a responsibility to ensure that they understand the objectives incumbent upon them.

All employees are required to take responsibility for their own work and the proper performance of anyone they manage. Learning and development are personal responsibilities. Individuals are required to take full advantage of the opportunities provided and to keep up-to-date with best practice in their own field.

All employees must perform their duties diligently and as directed by their manager. When dealing with the public employees must conform to any Customer Services Delivery Standards or equivalent standards issued to them.



All employees must comply with the terms and conditions of their contract of employment. All employees must avoid engaging in activities that are likely to breach that contract or bring disrepute or damage upon TfL, even where such conduct occurs outside of work. Employees must not do anything while on or off duty that could damage TfL's reputation and/or lead to criminal charges against them.

All employees must seek the prior written agreement of their manager before accepting a directorship in any company or entity, whether or not that entity has a contract or other business relationship with TfL.

5 Responsibilities

5.1 Employees

5.1.1 All employees must:

- a) Comply with this Code and the policies underlying its provisions as part of their terms and conditions of employment and/or terms of engagement.
- b) Recognise the importance of complying with this Code in terms of the provision of an excellent service to TfL's customers.

Employees must also comply with any statutory requirements of their role e.g. staff in politically restricted posts cannot engage in activities which are prohibited by the statutory rules for such posts.

Employees should be aware that failure to adhere to the principles contained in this Code, and/ or any policy applicable to their employment may be considered a disciplinary matter.

5.2 Managers

5.2.1 Additionally all managers must:

- a) Ensure that the requirements outlined in this Code are met including ensuring that employees are aware of them.
- b) Ensure that appropriate, fair and consistent action is taken to deal with any failure to conform to them, in accordance with the appropriate procedures.

5.3 Raising concerns

To maintain high standards, it is essential that everyone working for TfL feels able to raise any concerns they have about the way business is being conducted in a manner that is simple, effective and confidential. TfL will ensure employees feel able to raise concerns without fear of any reprisals being taken against them. This commitment is underpinned by the fact that employees have protection in law under the Public Interest Disclosure Act 1998. Certain kinds of disclosure qualify for protection such as those relating to:

- a) A criminal offence
- b) The breach of a legal obligation
- c) A miscarriage of justice



- d) A danger to the health and safety of any individual
- e) Damage to the environment
- f) Serious financial irregularities and
- g) Deliberate covering up of information relating to any of the above matters.

Concerns can be raised about any aspect of TfL's activities, e.g. the safety of the public and/or employees, fraud or financial impropriety, harassment, bullying, discrimination; decisions, actions, conduct or communications that are unlawful, in breach of policies or in significant breach of TfL's ethical values and vision. An employee should ask the following:

- a) Is the action legal?
- b) Is the action within the terms or the spirit of this Code and TfL policies and procedures?
- c) Can I justify this to myself, my manager, senior management and to my family?
- d) Is it right? Is it honest? Can I say it is not deceitful or misleading?
- e) Does it conform to the professional standards set by your professional body?

If the answer to any of the above questions is "no", an employee can raise a concern. TfL will protect anyone who raises such matters, provided the disclosures are made through appropriate channels, without malice and in good faith, regardless of whether the concern raised is upheld.

6 Where to get help and advice

Any concern that an employee has should be discussed in the first instance with their manager or someone else with authority in the area. Further information is provided on the [challenging wrongdoing](#) page on Platform.

6.1 Grievance

Grievances are concerns, problems or complaints that employees raise with their employers about their work, working conditions or relationships with colleagues or managers. Grievances may be raised informally or formally with the employees' immediate manager.

6.2 Independent reporting lines

If an employee feels unable, for whatever reason, to raise the matter through the grievance channel, or the nature of the concern does not fall within the grievance definition above, they can contact TfL's Counter Fraud and Corruption Team, TfL's service, SafeLine. SafeLine is administered by an independent company which provides an externally-based reporting line or through the Secretariat.



6.3 Contact details

All reports are dealt with on a confidential basis.

Counter-Fraud and Corruption can be contacted by:

Telephone: [REDACTED]

Email: [REDACTED]@tfl.gov.uk.

online reporting form

SafeLine can be contacted by:

Telephone: [REDACTED]

[Online reporting form](#)

The Secretariat can be contacted at:

Transport for London
General Counsel
4th floor (B5), 5 Endeavour Square,
London E20 1JN
Telephone: [REDACTED] or [REDACTED]

Email: [REDACTED]@tfl.gov.uk

6.4 Ownership and Review

The TfL Board owns this Code of Conduct policy. It will be regularly reviewed jointly by General Counsel and Group HR Policy.

The last substantive changes to the Code of Conduct were made on 1 October 2015. The document was reviewed on 21 August 2018 and updated to reflect revised SafeLine and Secretariat contact details.

7 Person accountable for the document

Name	Job title
Shamus Kenny	Head of Secretariat

8 Document history

Issue no.	Date	Changes	Author
A8	September 2018	Reviewed, updated and formatted using the current TMS template as per change No. CR-10868.	Shamus Kenny
A9	May 2022	Reviewed and updated section 6, 6.2 and 6.3 as per CR-15958.	Shamus Kenny

