



Ministry  
of Defence

de&s

# Code of Business Ethics

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DE&S

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## Message from the CEO



It is nearly three years since we first launched our DE&S Code of Business Ethics. We have made good progress over this period in embedding the values and standards we must all observe in our working lives. I am now pleased to introduce this second version which, while it continues to emphasise the enduring themes of the first edition, has been updated to reflect additional factors which have been more relevant over recent months. In particular, I feel it important that our Code now recognises that our ‘working environment’ has increasingly meant working from home and, as such, that our Code applies equally in this setting. The Code is intended to highlight a range of policies and guidance, not replace them, and to emphasise that we are all responsible for doing the right thing and seeking advice where we are uncertain.

As the first edition of this Code emphasised, demonstrating honesty and integrity is about more than just our image and acting within the law; it’s about protecting the public interest, and sustaining a great organisation in which we are all proud to work and in which each and every one of us can contribute safely, without fear of discrimination, bullying, harassment or harm.

It remains the case, of course, that protecting the reputation of DE&S and Defence, now and in the future depends on us all maintaining the highest standards of behaviour and acting with integrity in everything we do. This Code applies wherever we may be working - on MOD premises, at home, or elsewhere - and to all our people, both military and civilian. Ultimately, it’s about each of us knowing that we have done the right thing - acting honestly, treating each other fairly and with respect, and speaking out when others do not. This

Code sets the standard of behaviour that is expected of all of us. It helps us all make the right decisions when the correct course of action may not always be clear, and outlines how we should deal with situations that might be damaging to each other or to our organisation.


Breaches of this Code will be taken seriously so please speak out if you are concerned about anything. If you raise a concern in good faith - even if it is not confirmed by subsequent investigation - there will never be any action taken against you. I am committed, together with my Executive Committee colleagues, to working in accordance with this Code at all times. It is central to how we conduct ourselves every day in our place of work – no matter where we do our job, so please take time to read this Code and understand how it applies to you.


Finally, I want to re-emphasise that this Code is our enduring commitment to doing the right thing, in the right way, for the right reasons, every time — and everywhere.


December 2021


**OUR VALUES**

We have listened to our people and to our clients to understand what is important to them and how that drives us. Using their feedback as the starting point we have created four new DE&S specific values which, in time, will be woven through everything we do. We will use these values to define the high standards to which we aspire, and the successes that we celebrate. We will place them at the forefront of our decisions and priorities – as an organisation, and as individuals.

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**Excellence.** We constantly seek new and innovative ways to be better. We deliver on our promises.
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**Inclusivity.** Everyone matters. We feel and offer respect, value and acceptance. We seek out diversity of thought and perspective.
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**Collaboration.** Together we are stronger. We deliver more success through shared goals and mutual support.
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**Integrity.** We are trusted. We hold ourselves accountable for outcomes - good and bad.

## Overview

### Our Code of Business Ethics and Standards

Our Code presents a clear set of statements on those aspects of our working practices that underpin our standards. It is to be read in conjunction with, for civilian staff, the [Civil Service Code](#), other Departmental policies and guidance, and, for military staff, the Queen’s Regulations [1]. The Code is central to ‘how’ we do things and is aligned fully with the values of Excellence, Inclusivity, Collaboration and Integrity outlined in the [DE&S Strategy 2025](#).

Our Code sets the standards of behaviour that are expected of everybody who works for DE&S, whether as a Crown Servant (civilian or military employee) or a contractor working client-side, in a practical context. It aims to help DE&S employees make the right decisions and outlines how to deal with situations where they might be asked to do something which conflicts with this Code, or become aware that another employee is acting in conflict with it, and articulates how a concern can be raised. The policy and procedure for raising a concern in DE&S has been written in accordance with the process set out in the Civil Service Code.

Our Code summarises the main principles of our policies on acceptable conduct and behaviour, and all staff should note that the formal DE&S policies are held on the [Business Management System \(BMS\)](#).

### Why our Code is important

Our Code serves as a reference for all of us and articulates the standards and behaviours that we should embody. It represents the core of how we create the solid foundation of trust that is reflected in our relationships with customers, suppliers, and each other. As members of DE&S, we all have a personal responsibility to uphold and ensure the letter and spirit of our Code in our individual roles.

This Code explains how we should approach a range of situations we may find ourselves in. In simple terms, it’s about everyone having the confidence and support to ensure we do the right thing, in the right way, for the right reasons, at all times. But we also recognise that there may be times when we are faced with a situation not covered by this Code, or the policies it refers to, and we are not sure which course of action is best.

<sup>1</sup> These include: The Navy Service Core Values; The Values and Standards of the British Army; The Royal Air Force Ethos, Core Values and Standards; JSP 830 Manual of Service Law; and JSP 833 Minor Administrative Action

To help us make the right decisions, we should consider the following five questions when faced in such a situation:

### Five Questions

1. Is what I intend to do legal?
2. What would my family think if I acted a certain way?
3. Would it appear fair to my colleagues and manager?
4. If it were a story in the newspaper, how would it portray me, DE&S, and my parent organisation?
5. How would I feel if it happened to me?

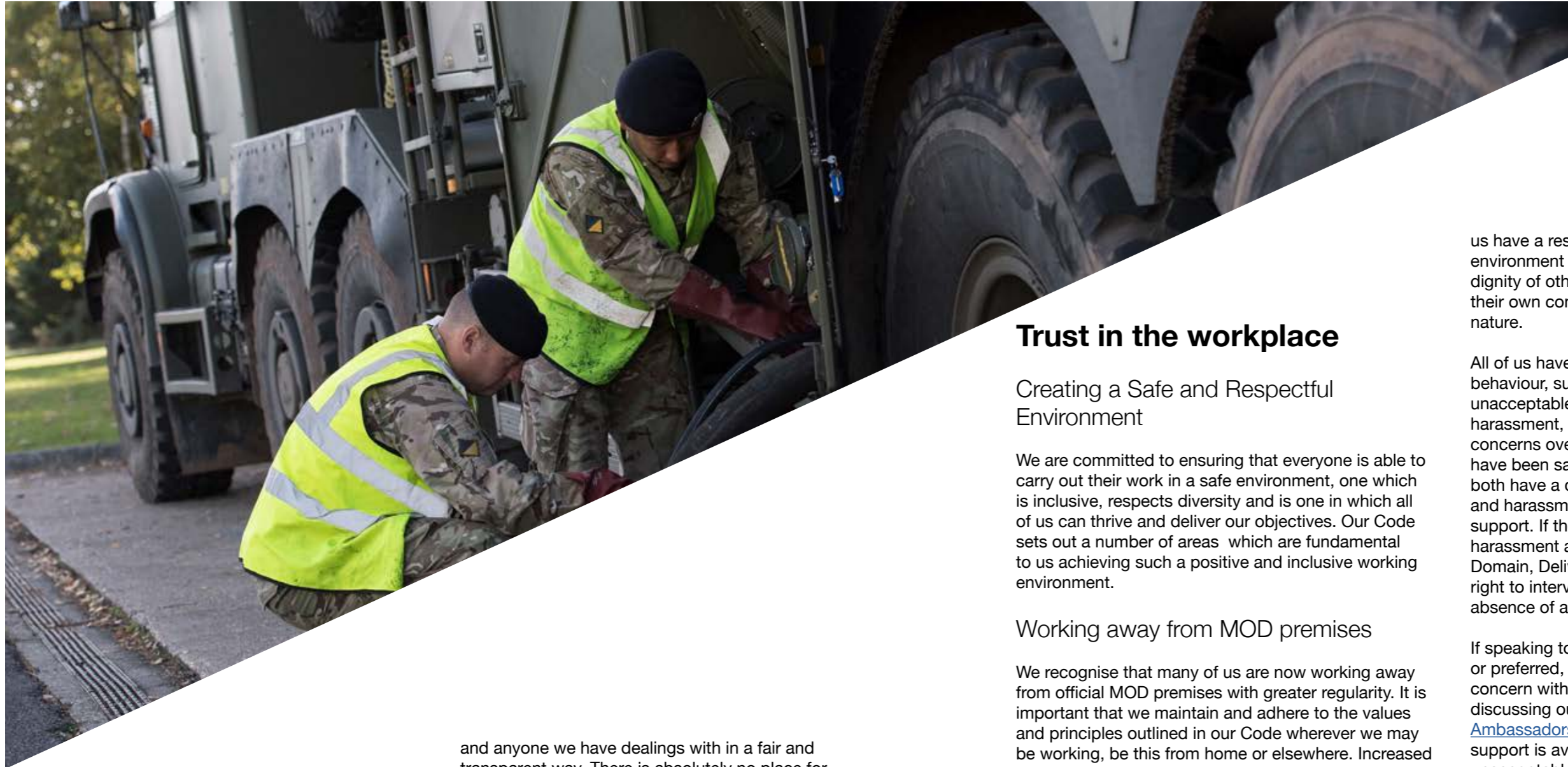
If we struggle with answering these questions **we are all responsible** for seeking guidance from, in the first instance, our Primary Delivery Manager (PDM), our Functional Development Officer (FDO), or from the DE&S Finance EPF Fraud, Risk & Assurance Team. Email: [DES-CEO-Ethics@mod.uk](mailto:DES-CEO-Ethics@mod.uk)

### To whom does our Code apply?

We expect everybody who works for us, whether as a civilian employee, service person or a contractor, to understand and uphold the high standards of conduct that the public rightly expect from a public body carrying out work of national importance and employing Crown Servants.

The nature of the relationship between the Crown and Civil Servants means that employees, as Civil Servants, must not behave in a way that would bring discredit on the Crown. This applies equally to members of the Armed Forces. DE&S follows the standards of conduct and behaviour laid down for the Ministry of Defence. We also expect all our employees to follow the specific DE&S Strategy 2025 Values - Excellence, Inclusivity, Collaboration, and Integrity - that support our organisation, which underpin our ways of working, and so help develop a high-performance culture.





## What are the consequences of breaching the Code?

We all have responsibilities under the Code, whether that be as a Job Holder, a PDM, FDO or as a member of our Senior Leadership Group. Acting with integrity and honesty are ethical principles that apply to all, regardless of our position or level within our organisation.

Complying with this Code and its supporting policies is a requirement of working at DE&S, and we are responsible for asking questions if we need clarification or advice.

Working in DE&S requires us all to behave with the highest standards of integrity in business and commercial relationships, and to treat our colleagues

and anyone we have dealings with in a fair and transparent way. There is absolutely no place for deception, bribery or fraud in our organisation. We all have a responsibility to read and understand the Code, and to understand and comply with the policies, standard working procedures and safety rules relevant to our job. Failure to comply with this Code and its supporting policies will be taken seriously.

We have zero tolerance of fraud and other unacceptable behaviour. Breaches will be investigated, and could result in disciplinary action up to and including dismissal. Allegations of serious offences will be reported to the police for investigation. Bringing the Department into disrepute could be a disciplinary offence.

**We all have a responsibility...**to report any arrest, charge, caution or conviction (regardless of whether connected to work or not) to our PDM immediately.

## Trust in the workplace

### Creating a Safe and Respectful Environment

We are committed to ensuring that everyone is able to carry out their work in a safe environment, one which is inclusive, respects diversity and is one in which all of us can thrive and deliver our objectives. Our Code sets out a number of areas which are fundamental to us achieving such a positive and inclusive working environment.

### Working away from MOD premises

We recognise that many of us are now working away from official MOD premises with greater regularity. It is important that we maintain and adhere to the values and principles outlined in our Code wherever we may be working, be this from home or elsewhere. Increased remote/hybrid working presents many benefits however we should not allow the flexibility that this offers to compromise adherence to our standards – especially security. We should also ensure that we follow our standards in the same way if we are required to use our own Personal Electronic Devices because our official devices are not working.

### Bullying & Harassment - Managing Unacceptable Behaviour

We will not tolerate bullying, harassment, discrimination or victimisation anywhere in our organisation. All of

us have a responsibility to ensure that the working environment is free of these behaviours and that the dignity of others is respected. Everyone must ensure that their own conduct does not amount to instances of this nature.

All of us have a duty to challenge unacceptable behaviour, support those who experience or witness unacceptable behaviour and report cases of bullying, harassment, discrimination or victimisation. This includes concerns over whether cases of bullying and harassment have been satisfactorily addressed. PDMs and FDOs both have a duty of care to those accused of bullying and harassment to ensure they receive the appropriate support. If there is sufficient evidence and/or patterns of harassment and bullying materialising within a specific Domain, Delivery Team or Function, DE&S reserves the right to intervene and undertake an investigation in the absence of an informal or formal complaint.

If speaking to our PDM or FDO is not an appropriate, or preferred, course of action, then we should raise our concern with someone we trust and are comfortable discussing our situation with – our [Fair Treatment Ambassadors](#) are here to ensure that guidance and support is available to civilian colleagues experiencing unacceptable behaviours in the workplace.

Further advice can also be obtained from the dedicated Bullying, Harassment and Discrimination Hotline (Tel: 0800 783 0334). The MOD 'Speaksafe' helpline (01442 424503) is available for civilian staff and offers a safe place to discuss issues relating to bullying, harassment and discrimination in the workplace. We also have access to the [Employee Assistance Programme \(EAP\)](#) who offer a confidential telephone based 'listening ear' service. Access to the service is via telephone: 0800 783 0335 or the [EAP online portal](#). Military colleagues should contact their Military Welfare Officer or their local Administration Unit.

**We are all responsible...**for conducting ourselves in an appropriate and professional manner and, where this does not occur, for challenging or reporting instances of bullying and harassment, whether we experience them ourselves or observe them in the workplace, including on virtual calls. Everybody has a responsibility to listen and assist a colleague who raises a concern.



## Diversity & Inclusion

We want DE&S to be an open, diverse and inclusive organisation. An organisation with diverse skills, resources and perspectives will perform better, make better decisions and deliver stronger outcomes. As such we are committed to creating an inclusive working environment where diverse individual contributions are recognised, talent is developed, and everyone has an equal opportunity to achieve their potential.

This means that we expect all our people to treat each other, members of the public, our stakeholders and partners with respect. A respectful and open environment recognises and values the power of difference. We are committed to ensuring every member of DE&S is able to contribute successfully. This requires an inclusive, supportive team-working approach, being both flexible and open.

Our policy reflects the requirements of the Equality Act 2010. Discrimination, on the grounds of an individual's protected characteristic, will not be tolerated. The protected characteristics are: age, disability, gender reassignment, pregnancy or maternity, race (including ethnic or national origins, colour or nationality), religion or belief (including lack of religion/ belief), marriage or civil partnership, sex and sexual orientation. It is also discrimination to treat an employee that is a member of a union or a TU representative unfavourably.

The Reasonable Adjustment Service Team (RAST) can help PDMs to make changes to make work more accessible for team members. DE&S has a legal obligation to provide reasonable and timely adjustments for disabled staff to enable them to maximise their potential. We are committed to our responsibilities under the Public Sector Equality Duty. See our Equality, Diversity, Inclusion and Wellbeing Strategy and Action Plan and how to access reasonable adjustments on our [Diversity, inclusion and wellbeing portal](#).

**We all have the responsibility...as public servants to consider the opportunities to promote Equality, Diversity, Inclusion and Wellbeing and the risks to these in the decisions we take.**

## Misuse of Intoxicating Substances

Addictions and substance misuse can affect both home and work life. Our [Misuse of Intoxicating Substances](#) policy ensures that all employees have clear guidance on upholding DE&S' standards. The misuse of intoxicating substances is not only dangerous, but can also be illegal under UK criminal law.

The use and misuse of intoxicating substances includes alcohol, solvents, legal and illegal drugs, prescription and over-the-counter medicines, and other substances that could adversely affect an employee's performance and judgement, as well as the health and safety of themselves and colleagues, and the public. The correct use of prescribed drugs and over-the-counter medicines is not prohibited, however incorrect use could be classed as misuse.

## Ensuring our Personal Safety

We should all be working within the totality of policies, procedures and documentation that enables the effective management of Safety and Environmental Protection in all its aspects across DE&S, as laid down in the [Safety & Environmental Management System](#).

We are all responsible for working safely ... so that nobody is put at risk as we undertake our day to day duties. This includes travelling to and from our place of work (if not working from home), cycling on sites, and especially when entering or leaving our sites by car where pedestrians are present. We should report incidents and near misses and ensure site Safety Health Environment and Fire (SHEF) teams are aware of what is happening on their sites; the more they know, the better they can keep everyone safe. [Reporting Incidents and Near Misses](#).

## Use of ICT Resources

Our Information and Communications Technology (ICT) systems are intended for official business use, but we can make reasonable and sensible personal use of them, as long as we behave responsibly, keep to our [Acceptable Use Policy \(JSP740\)](#) and don't break the law. The AUP applies to everyone (military and civilian) at all times when using the MOD's ICT and services. It also applies when we are working remotely, from other sites or from home, or on detached duty, and using ICT and services supplied by another authority for our work for Defence.

It is acceptable to use the internet occasionally, make an urgent personal call or send a private email, but it is not acceptable to let personal use interfere with our work, or to incur any unreasonable or significant cost to MOD. This is particularly important when we are working remotely, either from home or other sites. We should use our own device for personal needs wherever possible. If we do not want the MOD to know our personal business, we should not use MOD systems to conduct it – remember MOD systems are monitored.

## Use of Social Media

We live in a digital age where the use of social media, including by DE&S, brings tremendous advantages to both our working and personal lives. Social media, such as Facebook and Twitter, are increasingly used to communicate, discuss and disseminate information. We are all encouraged to consider using social media to communicate and engage where it will promote Defence or help to develop policy, provided it is used in a safe and responsible way and in line with corporate guidelines. In addition, we have approved corporate social media tools, such as Defence Connect, that enable us to communicate and engage with our Defence colleagues.

The lines between our personal life and our work life can become blurred when using social media. When using social media in a personal capacity we must be careful not to compromise our personal security and safety or that of our friends and family. We must protect our reputation and that of our organisation from embarrassment or legal challenge. We must always ensure that it is clear that our comments are our own and not those of DE&S or the MOD, and must never bring the organisation or Department into disrepute. Keep in mind that these transmissions are permanent.

Any use of social media in an official capacity must be approved beforehand.

Defence corporate guidelines on external communication, including with the media and use of social media and all other forms of public engagement including speeches and presentations at conferences or other events where the public or media may be present can be found here; [2020DIN03-005](#).

## Use of Personal Electronic Devices

Mobile devices allow us to benefit from more productive and flexible ways of working, but Defence needs to balance this with the real cyber threats they can pose to our information in our more sensitive areas. This also includes when our official device may not be working and where we may be able to temporarily use our personal devices for non-sensitive business. This applies to both MOD and personal Portable Electronic Devices. PEDs include mobile phones, Wi-Fi enabled laptops, smart watches, e-readers and fitness trackers. It also applies when we are working remotely including when our official device may not be working.

**We are all responsible...for ensuring that we adhere to the restrictions on the use of PEDs around our sites and when working remotely. There are certain areas where the use of all PEDs may be barred, or where only MOD provided (but not personal) devices are permitted.**

## Protecting Personal Information

We collect and use personal information about our employees (whether current, past or prospective), contractors and suppliers for legitimate business purposes. Only those individuals authorised to do so may view this information.

We are all responsible for ensuring that we protect personal information in accordance with the Data Protection Act 2018 (and any successor legislation) and other relevant legislation and policy including the Freedom of Information Act, Government Security Classification rules and MOD policy (JSP 441). In particular, a breach of Data Protection Act may cause damage and distress to the individual(s) concerned, and could result in a large fine and damage our reputation. Personal information should always be handled with care. If we use common sense rules around how we handle personal information, it's less likely to be damaged, disclosed to unauthorised people or lost.

In the event of a data security breach related to any personal data, please immediately notify your Information Asset Owner. [Reporting a personal data breach - JSP 441](#)

**We should all be aware that breaching our security protocols may result in disciplinary action.**

## Unauthorised Disclosure of Official Information

We are all obliged to protect official information that has been shared or communicated in confidence. We accept this obligation when we sign our acknowledgement of the [Official Secrets Act](#) and Confidentiality Undertakings upon joining the [MOD FORM 134](#). This obligation remains with us, even after leaving the MOD due to retirement or when we take up another job with a different organisation. Leaking of such information is unprofessional, unethical and fundamentally wrong. At its worst it risks the lives of other colleagues serving to protect the nation and its interests together with the loss of trust by key decision makers in our ability to manage our affairs and provide professional, confidential advice.

We all have a role to play in combating leaking, starting with ensuring we keep the circulation of sensitive material to an absolute minimum. Those who are identified as having made a serious, unauthorised disclosure can expect to receive a major disciplinary penalty, up to and including dismissal and possible prosecution. See also below on Business Appointments.

**We all have an obligation...to protect official information.**



## Trust in business practices

Within DE&S, we know that operating our business with the highest integrity is critical to our success. No matter where we are located, or what our role in the organisation, each of us has a responsibility to ensure we conduct business ethically and honestly. It is how we build trust with our customers, suppliers, and each other, every day. There are certain areas of our day to day activity in which this is particularly important. This section looks at them in more detail.

### Business Travel

It is important that we think about how we deliver value for money every time we travel for business or claim expenses.

In order to keep our travel expenses as low as possible, before we arrange a meeting, we should think about alternative methods in which the meeting could be conducted, including telephone, teleconference or video conference, to avoid the need to travel to other locations.

When we do have to travel, civilian employees must abide by the MOD Business Travel Guidance supplemented by the DE&S Travel & Subsistence policy. Military staff have particular regulations they must

adhere to, especially with regard to staying in military accommodation rather than hotels and what may and may not be claimed for subsistence. In some instances, these are different from the rules covering civil servants. [MOD Business Travel Guidance](#).

It is the duty of us all to ensure that taxpayers' money is used correctly and the necessary and appropriate costs that we incur in travelling on our business are correctly authorised, recorded and checked. As a public body we are required to be transparent about our expenditure and may also be required to provide details on this as part of a Freedom of Information Act (FOIA) request. Our reputation is open to public scrutiny and, as such it is important that we all act in accordance with the rules. [DE&S Travel and Subsistence Policy](#).

**We are all responsible for...**adhering to the Travel & Subsistence policy, in particular gaining pre-authorization where required, and for maintaining a record of our expenditure and receipts.

**PDMs are responsible for...**pre-authorising T&S where necessary and undertaking quarterly checks of staff claims in accordance with the DE&S policy.

## Gifts and Hospitality

Working for DE&S requires many of us to engage closely with our suppliers, foreign government bodies and other organisations who might offer gifts and hospitality as part of everyday business.

As an organisation, we are responsible for placing contracts, and committing to courses of action, which involve significant amounts of taxpayers' money. As such, the risk of fraudulent activity and/or damage to our reputation is significant. To counter this, we must ensure that we act at all times with integrity and that our decisions are not unduly influenced. We therefore have to act with particular care when considering the appropriateness of the gifts or hospitality that may be offered to us and, indeed, what we may offer to others.

To help us, we have developed a specific DE&S policy and a pre-authorization template that we must all ensure we are familiar with and adhere to. [DE&S Gifts and Hospitality Policy](#).

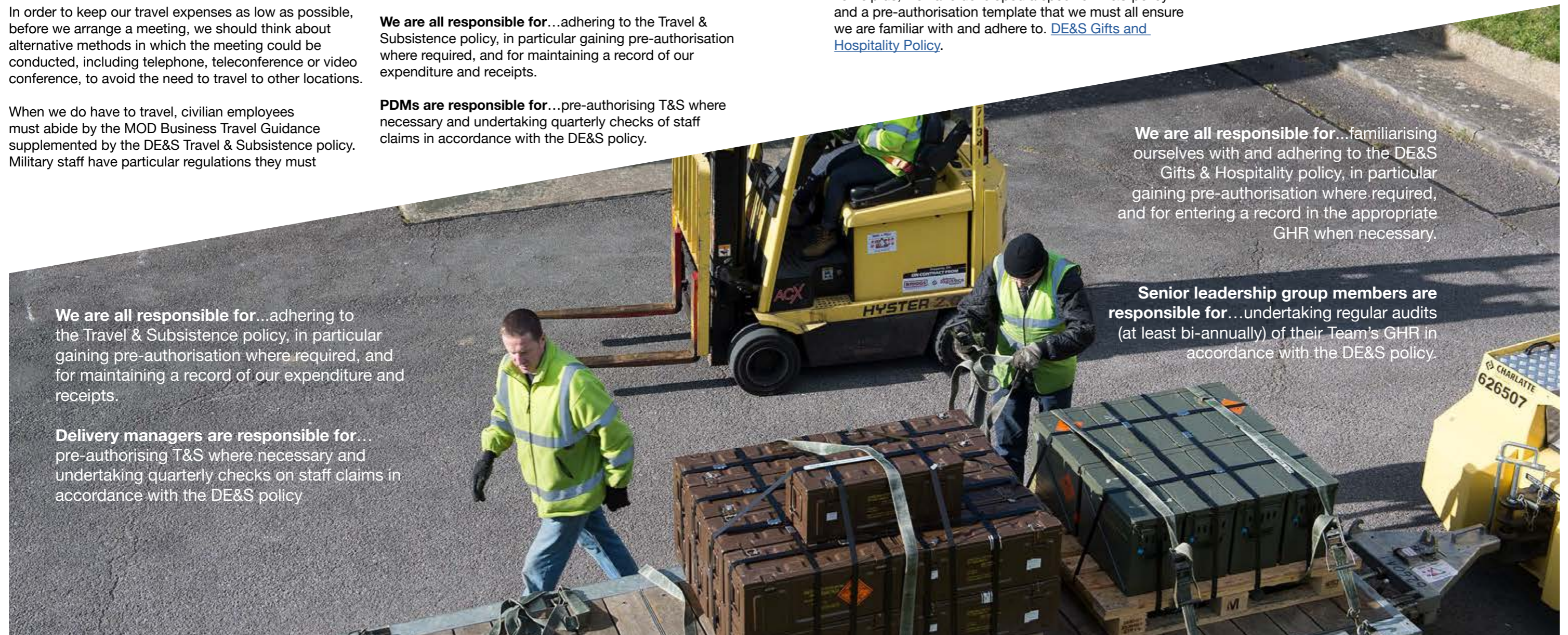
Every time we receive an offer of a gift or hospitality, we must check whether it must be recorded in the MOD Gifts and Hospitality Register (GHR), even if the gift or hospitality is declined. Acceptance of any hospitality (valued at over £10.00), must be pre-authorized. Only gifts received under certain criteria and under a certain value can be retained. If in doubt, it is always better to declare an entry in the GHR. Members of the Senior Leadership Group are responsible for auditing their GHR(s) at regular intervals (at least bi-annually), to ensure that the DE&S policy has been complied with.

**We are all responsible for...**familiarising ourselves with and adhering to the DE&S Gifts & Hospitality policy, in particular gaining pre-authorization where required, and for entering a record in the appropriate GHR when necessary.

**Senior leadership group members are responsible for...**undertaking regular audits (at least bi-annually) of their Team's GHR in accordance with the DE&S policy.

**We are all responsible for...**adhering to the Travel & Subsistence policy, in particular gaining pre-authorization where required, and for maintaining a record of our expenditure and receipts.

**Delivery managers are responsible for...**pre-authorising T&S where necessary and undertaking quarterly checks on staff claims in accordance with the DE&S policy





## Sponsorship

Sponsorship can offer us a number of benefits, both in terms of offsetting costs to the public purse and in enhancing the profile of Defence and DE&S in the public eye. But care must be taken in how such activities are arranged and we must all ensure that we abide by the principles that are set out in the policy (JSP 462), which emphasises that we must ensure an even-handed approach, and it would be unfair to support one individual or organisation while refusing requests from others. This is to ensure that our reputation is protected and that no accusation of undue influence might be made. [JSP 462 Financial Management and Charging Policy Manual](#) (Chapter 7).

## Avoiding a Potential Conflict of Interest

DE&S requires us to avoid any conflict, and to take steps to address even the appearance or perception of a conflict, between our personal interests and the interests of the organisation and wider MOD. This includes anything that may be viewed as preferential treatment or favouritism to individuals, companies or other bodies. In particular, we must not use any information acquired in the course of official duties to advance our private financial or other interests, or, importantly, the interests of those close to us.

Conflict of Interest could also include any kind of secondary employment which could be perceived as impacting on our ability to perform our Official Duties

and approval should be sought before taking up any secondary employment.

We should all be mindful of our personal relationships at work and whether they could be perceived to cause a conflict of interest in situations such as recruitment or managerial responsibilities.

To ensure that we can manage this appropriately, all of us are required to make an annual declaration of interest; this may need to be updated more frequently should there be a change in circumstance (such as a partner changing role or employer), and it is our responsibility to ensure this is done if required. It is also important that declarations are current when we are applying for internal promotions on changing assignment. This declaration is to be made by completing the electronic Declaration of Interest form found on the Corporate Governance Portal; this will cover all relevant interests including in particular financial interests, outside appointments and interests of close relations or family members. [DE&S Declarations of Interest](#).

Remember, a conflict of interest is defined as “A set of circumstances that create a risk that an individual’s ability to apply judgement or act in one role is, or could be, impaired or influenced by a secondary interest” It is not necessarily a violation of our Code, but it is important to disclose it. This allows the situation to be properly reviewed and managed.

**PDMs are responsible for...** reviewing DOI declarations and agreeing mitigation plans.

## Business Appointments

You may be required to seek permission before accepting a job on leaving DE&S; you should familiarise yourself with [DE&S Business Appointments Guidance](#). This is to safeguard you and the Department against reasonable actual or perceived concerns that you were influenced in your MOD role by the prospect of the job, or that the hiring organisation is offering you a job in order to gain unfair advantage from your contacts or knowledge of sensitive information or unannounced policy. This applies to all civilian employees and all officers and warrant officers. For the most senior people (Director General and above, and military equivalents), the Advisory Committee on Business Appointments is responsible for considering applications.

**We are all responsible for...** ensuring that we give early consideration to the possible need for clearance for any business appointment when we leave MOD.

## Preventing Fraud

Fraud is wrongful or criminal deception intended to result in financial or personal gain. DE&S has a zero-tolerance approach to fraud.

Being aware of the behaviours that could indicate fraudulent activity, and reporting our concerns, is often the best defence against fraud. Information on these behaviours is outlined on the [DE&S Counter Fraud Bribery and Corruption web-page](#). Fraud is a crime which is committed by ordinary people who, for whatever reason, have the motive and opportunity to do so. In some cases, individuals will find themselves being compelled to act incorrectly due to personal pressures which cloud their judgement.

Fraud is still most likely to be detected by a tip-off, which is why MOD has an anonymous reporting system to report concerns and suspicions of fraudulent activity. If we suspect fraud or need advice, we should raise our concern with the Confidential Hotline, which can be contacted on 0800 161 3655 (UK), +44 1371 85 4881 (overseas) or email at [confidential-hotline@mod.gov.uk](mailto:confidential-hotline@mod.gov.uk).

**We all have a responsibility...** to act in accordance with the [Civil Service Code](#) and this [DE&S Code of Business Ethics](#), to stand up against unethical behaviour, protect assets and personnel, and to speak up when we witness wrongdoing.

## Acting as a good corporate citizen

### Our Commitment to Working Sustainably

We are a large organisation with a significant responsibility to deliver value to the taxpayer and society, including minimising our impact on the environment by improving, where we can, our working practices, including the opportunities afforded by agile working.

We are committed to helping achieve Government Priorities including Net Zero Emissions across operations, infrastructure and capabilities. We will monitor our progress towards these by limiting or altering our energy usage and our travel, minimising waste and contamination, building our resilience to risks associated with changing climates and scarce resources and by using digital formats (rather than paper) to conduct meetings and produce our outputs.

**We are all responsible for...** conducting our work activities in a sustainable and environmentally responsible way.

### Volunteering and Working for Charities

We are committed to being a diverse and talented workforce. Many of us have strong connections to, or affiliations with, charitable and other bodies that serve our communities. We support all our staff in seeking to utilise their skills across those communities in which they live, and for the betterment of those charities they support.

While we do offer such support, we do have to ensure that all Charities and volunteering opportunities are treated fairly and equally. Charities, whether Service related or otherwise, are not entitled to preferential treatment due to their charitable or not for profit status. They are to be treated like any other outside body seeking to use our facilities. Public money must not be used for private benefit, no matter how worthy the cause. In particular, private companies should not be approached to donate raffle prizes or to sponsor charity events. [JSP 462 Financial Management and Charging Policy Manual](#) provides guidance, including on Regularity and Propriety (Chapter 14).

For civilian employees, Special Leave is available for the support of charity and volunteering activity and may be granted in certain circumstances with PDM and FDO approval. In accordance with [DE&S Leave Policy](#).



**We are all responsible for...** ensuring we make a formal declaration of our interests, in line with DE&S policy, at least once annually or whenever our declaration requires amending as circumstances change. In particular, we should ensure that our declaration is up to date when applying for internal promotions or when considering changing assignment. Completing the Declarations of Interest return.

## Whistleblowing and Raising a Concern ('Speaking out')

We are committed to ensuring the highest standards of conduct in all that we do. However, wrongdoing can occur. We are all expected to raise concerns when we believe that another employee is doing, or asking others to do, something that goes against the Civil Service Code, is illegal or endangers others within DE&S or other members of the public.

DE&S wants a positive 'speaking out' culture so that concerns can be raised and dealt with promptly and professionally. For Civil Servants, the Whistleblowing and Raising a Concern policy and procedure should be followed which has been written in accordance with the process set out in the Civil Service Code and Civil Service Management Code.

If any of us are worried about an issue or have a concern, we should first talk to our PDM or FDO who have a duty of care to provide support. If for whatever reason we feel unable to do that, we should raise the concern with the Confidential Hotline, which can be contacted on 0800 161 3655 (UK), +44 1371 85 4881 (overseas) or email at confidential-hotline@mod.gov.uk. The hotline is open to both civilian and military staff. The Hotline team will listen to the concerns raised and provide professional advice and guidance. Alternative routes for raising a concern are listed in the Whistleblowing and Raising a Concern policy located on the BMS

For Service Personnel, issues relating to offences covered under the Armed Forces Act (AFA) 2006 and single service core values will be managed through the appropriate service discipline chain. Matters will be referred back to the Service Police Authorities and/or to the employee's Chain of Command.

**We are all responsible for...**raising concerns when it is believed that an employee is doing, or asking others to do, something that goes against the DE&S Code of Business Ethics, Civil Service Code or statements of Service ethos, is illegal or endangers others within the organisation or the public – this can be a past, present or possible imminent wrongdoing, or an attempt to cover up wrongdoing.

## Anti-retaliation Statement

DE&S has an equal duty to protect all of its employees and will not tolerate any form of retribution taken against employees using the policy and process to raise a genuine concern. This extends to both civilian and Service Personnel, recognising that civilians can be afforded protection in law, but Service Personnel have no statutory protection regarding qualifying disclosures. Providing employees are acting honestly, it does not matter if the concerns raised are mistaken. We will not tolerate the victimisation of anyone raising a concern and robust action will be taken against anyone found to be responsible for such actions.

If you believe you have been retaliated against for reporting or responding to a complaint made in good faith, or cooperating in an investigation, notify the Confidential Hotline immediately.

## Where to go if you need information or help

This Code summarises how we are to conduct ourselves in the workplace and in our business lives. You can access further information and guidance on many of the elements of our Code on the [DE&S Corporate Governance portal](#), the [DE&S HR portal](#) and the [DE&S Business Management System \(BMS\)](#).

The DE&S Fraud, Risk and Assurance team, which is part of the Finance Directorate, is responsible for providing advice and guidance on many aspects of the elements of this Code. The team can be contacted at DESCEO-Ethics@mod.gov.uk.

Speaksafe Hotline:

01442 424503 (civilian staff)

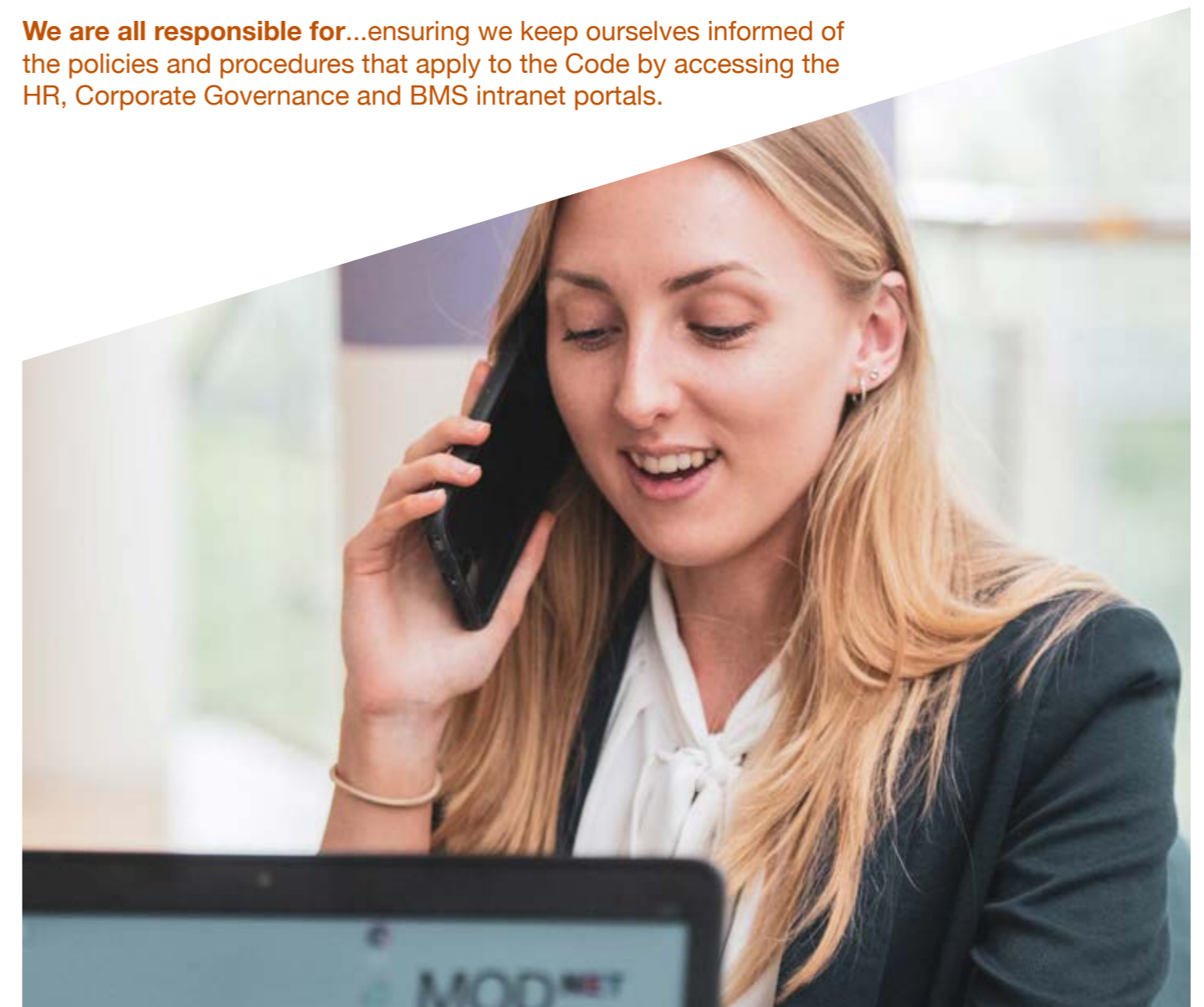
Employee Assistance Programme:

0800 783 0335  
healthassuredeap.co.uk

Confidential Hotline (breaches of code):

0800 161 3665 (UK)  
+441371 85 4881 (Overseas) – all staff  
Confidential-hotline@mod.gov.uk

**We are all responsible for...**ensuring we keep ourselves informed of the policies and procedures that apply to the Code by accessing the HR, Corporate Governance and BMS intranet portals.







Ministry  
of Defence



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