

THE CHALLENGE OF IMPLEMENTING CODES OF CONDUCT IN LOCAL GOVERNMENT AUTHORITIES

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The problem with Codes of Conduct is that it is easy to stick them on the wall, but hard to make them stick in practice. It doesn't seem to matter whether a Code has been developed to satisfy a legal requirement, such as the Queensland Public Sector Ethics Act, 1994, or because a Mayor or Chief Executive has sought to satisfy a noble sentiment that a Code of Conduct will lead the organisation into more ethical behaviour, or whether the Code has been designed to provide a set of sanctions for poor behaviour. Without an effective development and implementation strategy which is integrated and engages with the heart and bowels issues of concern to the organisation. the net result seems consistently the same: that the Code of Conduct remains a mere piece of paper. displayed or appealed to when convenient, but ignored the rest of the time.

So if you are thinking about putting a Code of Conduct in place without much strategic thought and soul-searching about development and implementation processes. then you would be well advised to:

- 1) forget it. It's not worth the time and effort, or
- 2) ignore the experience shared in this chapter, and
- 3) keep decorating the walls.

However, if you view your Code of Conduct as a potential supplement or complement to the range of things that you are doing to build. enhance and maintain an ethical performance culture in your organisation. then read on.

In what follows, a number of suggestions will be made, based on the experience of a number of organisations in both the public and private sectors, on how to effectively implement a Code of Conduct. Some insights will be developed about the processes that will enable your Code of Conduct to serve as a useful tool in building a matrix of well understood principles and operating values. Last, some experience will be shared on the formation and maintenance of your organisation's sense of its ethical obligations and to enhance the reputation and performance of your organisation and its management team.

In what follows, a heavy emphasis will be placed on the basic importance of working with a highly participative process for developing a Code of Conduct, in order to establish ownership and commitment at all levels, including elected officials and appointed staff. The effective impact of a Code of Conduct on the management of the Corporate, Strategic and Operating planning work of the organisation will be discussed, and a rationale will be provided for the foundational importance of leadership ownership and modelling of the Code of Conduct. The critical nature of the relationship will be demonstrated between an underpinning Code of Conduct and the ethical standards and behaviour of key functional areas in an organisation. such as Procurement and Supply, Human Resource Management, Customer Service operations, Community Development and Infrastructure Development services. And a claim will be made, and sustained, that the

successful establishment of an ethical organisational culture will enhance significantly the trust and respect of the community for both its elected and appointed officers.

Developing a Code of Conduct

Whatever the stimulus for the establishment of a Code of Conduct, whether because of legislative requirements or executive initiative, it is of fundamental importance that the process by which Codes of Conduct are developed is managed in a way which supports and enables effective implementation. Failure to engage all stakeholders in the thinking and debate about the nature and provisions of the Code dooms the walls to be adorned with the decorated scroll work beloved of Code Makers, and the spirit and provisions of the Code will be ignored by those for whom its guidance is intended.

The organisation's leadership must take the lead and be prepared to allocate, and be seen to invest time and resources in the development process. The key stakeholder groups must be consulted over the process by which the Code will be developed, with the aim that every member of the organisation will understand the basis of the Code, and its intended purposes and operation. The development process will need to be open to input at every level of the organisation, which can sometimes be very threatening, as dirty linen will be aired, and issues raised which many people would prefer to forget. However, unless the organisation is prepared to be open and listening to both positive suggestions and also critical comments, then the bona fides of management will not be established and the development will become an empty exercise. Once the dam wall breaks, however, the result will be an increasingly informed debate and dialogue about the content of the Code and its potential application to every part of the organisation.

Types of Codes

At this point, it is important to consider the issue of the nature of the proposed Code of Conduct and how it is intended to be applied. There are three types of Codes, each with its own distinctive emphasis. The first is the 'Ethical Code', where guiding principles for conduct are laid down within a moral or philosophical framework. Examples of such principles include:

"We will value and respect all employees", and, "We will always put The Public Interest first", and so on.

The second type of Code is the 'Behavioural Code', where particular classes of behaviours are either prohibited or enjoined, such as: "Bullying and intimidation will not be tolerated", and, "Selection and promotion of staff will be on merit alone".

The third type of Code is the 'Code of Practice', which lays down, often in considerable detail, the operating practices and standards required by the organisation, such as: "Supplier invoices will be paid within 30 days of receipt". and, "Customers complaints will be acknowledged within 3 days and a full response made within 21 days".

In developing a Code of Conduct for your Council, you will find that the ideas and suggestions advanced by staff, customers and other stakeholders will encompass all three of the emphases above, ranging from philosophical principles or moral injunctions to very detailed prescriptions for operational activity. This can be very frustrating if there is no over-all framework for the values and ethics of the organisation.

A Framework for Organisational Ethics

The following framework has been found to be robust, in the sense of transportable into many organisational settings, and useful in practice, to sort the multitude of suggestions made during consultative processes:

1. A Values Statement at the corporate level alongside the Vision and Mission of the organisation, which provides the guiding principles for the conduct of business and relationships, and which incorporates the values of the Ethical Code type outlined above.
2. A Code of Conduct which draws out the implications of the Values Statement and provides examples of the application of the guiding principles. The Code of Conduct functions as something like a set of middle axioms, (with apologies to William Temple) which bridge the gap between principle and practice.
3. Sets of Ground Rules, developed and applied in the operating units of the organisation. that are very specific about the behaviours and standards required to give effect to the provisions of the Code of Conduct and the Values Statement on a day by day basis in that particular part of the organisation. These Ground Rules are shaped as much by the specific ethical challenges faced by the staff in the particular context of their operating unit, as by the more generalised Code of Conduct.

The working inter-relationships between these three levels will be discussed in the next section of this chapter, 'Corporate, Strategic and Operating Planning Processes'. However, in the process of development of your Code of Conduct, you will need to make provision for shaping and locating the many suggestions so that they fit into an agreed framework for the nurturing and sustenance of the ethical culture of your organisation.

To return to the issue of adopting an effective process for the development of the Code of Conduct (and the accompanying Ground Rules for operating units), we need to consider how we can establish the debate and dialogue referred to above in drawing out the ethical needs and aspirations of the organisation. What do we mean by 'dialogue', and how can it work in involving all stakeholders in shaping a Code of Conduct?

The process of 'dialogue' is being recognised increasingly by practitioners as a powerful means of focusing organisational 'conversation', as Peter Senge calls the process of exploring and creating

shared meaning (Senge: 1994, 352)¹ Dialogue enables the emergence of genuine organisational learning and broad consensus. The dialogic process, as David Tracy frames it, requires that participants are open to the possibility ‘that something else (i.e. other than what is presently held) might be the case’ (Tracy: 1981, 102)². Dialogue, therefore, as opposed to debate (or even discussion), is a powerful process for surfacing and exploring the values that we bring to, and seek to find in our workplaces and organisations. Dialogue enables us to tell our own, and really hear one another’s stories, which imbues us with the confidence and mutual trust which is a pre-requisite for sharing our aspirations and learnings.

Process models

In developing the content of a Code of Conduct, is it better to start with a blank slate, or with a draft Code? The ethics experts will be anxious to provide a draft set of Code provisions, as their organisational reputation needs to be buttressed and they will often feel the need to be seen to be adding value. However, care should be taken not to set the agenda too narrowly, whether by ethics experts or by legislative requirement, as in the Queensland Public Sector Ethics Act. The key is to be open and responsive to stakeholder needs and aspirations, and to take on board all perspectives and suggestions.

Two suggestions are outlined below for building a process of organisational dialogue about values which will form and shape the content of a Code of Conduct. The first can be described as the *traditional consultative!* approach and the second as the *radical dialogical* approach.

The Consultative Approach

In the traditional consultative approach, it is usually better to seek suggestions on what the content of the Code might encompass within a number of broad headings, such as ‘public trust and public service’, ‘honest and open dealing’, ‘personal and organisational integrity’, ‘providing value for money’, ‘fraud, waste and corruption’ etc. The process of putting meat on the bones will need to be agreed by the key stakeholders, including Councillors, management and staff representatives, and perhaps community representatives who are regularly involved in Council consultation processes. That process may involve workplace meetings, both on and off the job, requests for written and verbal submissions, analysis of staff and customer surveys, including community opinion on relevant issues, and other participative processes. As the consultation process unfolds, it will be important to shape the outcomes so that the Code does not become a series of moral prescriptions, but a set of ethical directions, which can function as an aid to enhanced ethical judgement and discretion at all levels of the organisation.

The Dialogic Approach

A powerful approach for opening up and continuing the process of dialogue is found in Harrison Owen’s model, which he calls “Open Space Technology”, and which he describes in a book of the

¹ *The Fifth Discipline Handbook*: 1994, Peter Senge et al, Nicholas Brealey Publishing Ltd. London

² *The Analogical Imagination*. 1981: David Tracy. Crossroad, NY

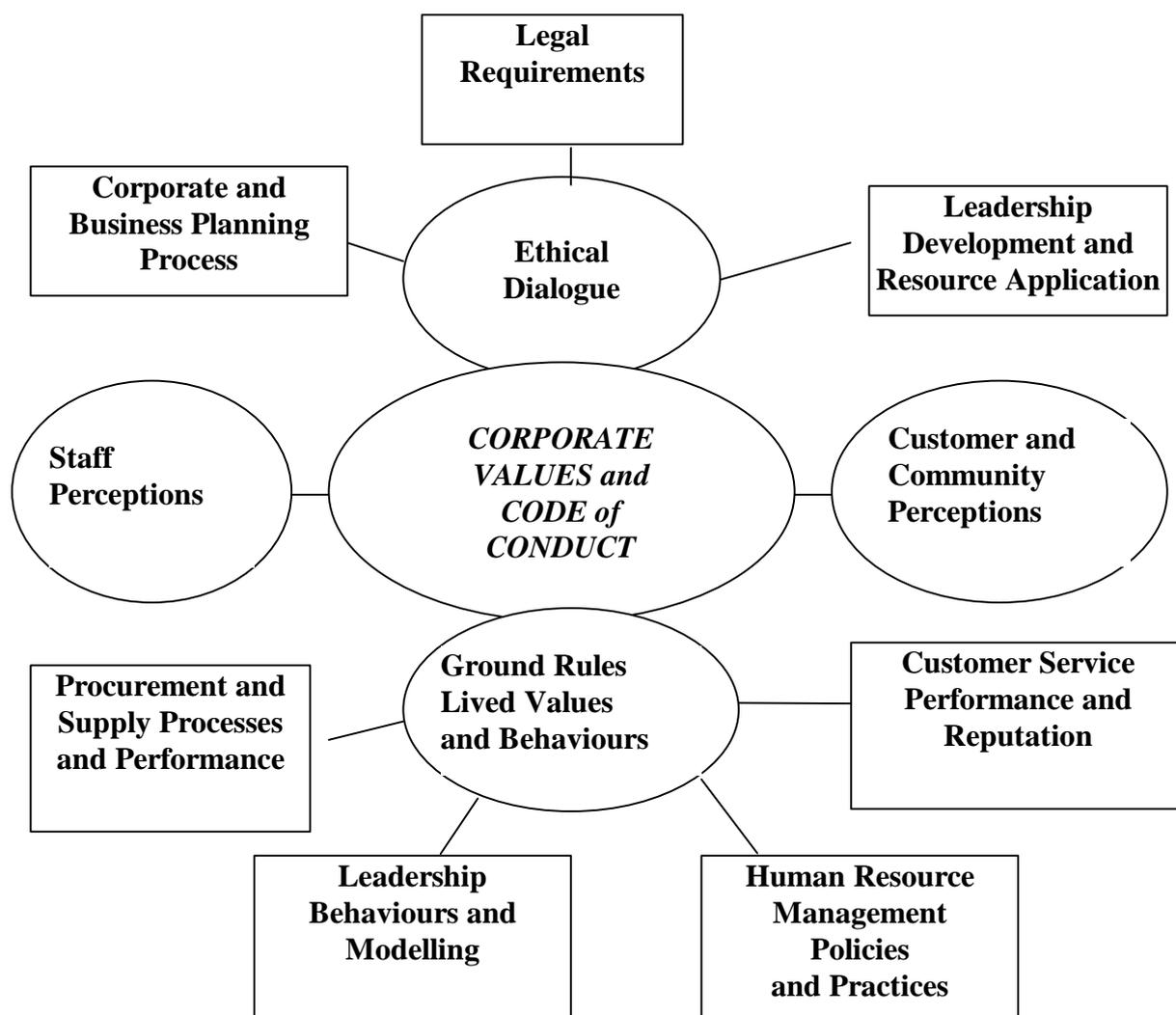
same name (Owen, 1992)³. In this approach, all members of the organisation, including the stakeholders (community representatives, suppliers, customers etc) are invited to come together to around a theme, such *Enhancing the Ethical Health of our Organisation* '. At least two, or better three days are required, and participants are invited to structure their own agendas within an open and inclusive environment. There is very little formal structure to this process, although a number of sub-processes such as 'bulletin boards' and 'ideas market places' are used to keep the dialogue process moving. Conclusions and consensus emerge when they emerge, and this is often in a progressive fashion as ideas and initiatives move from small, self-selected group discussion into the Open Space of the whole assembly of participants.

The advantages of such a dialogical process are that it optimises creativity and sharpens shared insights. The process itself builds consensus and commitment, and establishes a critical mass of people who want the Code of Conduct to be effective in the organisation. It also enables people at different levels to really hear one another, often for the first time, and to learn to learn from, and respond to one another. However, it is a risky process for managers who are hooked on 'control', or who cannot believe that something other than what they believe might well be the case.

Commitment to a dialogic process for developing a Code of Conduct, whether it is through an Open Space Technology approach or some other technique, has a major advantage in that it enables participants to learn how to conduct an ongoing dialogue in their own workplace, as they sharpen their own ethical judgement and make ethical decisions together for behaviour and the conduct of business.

The diagram hereunder provides a road map for further discussion of the key issues in development and implementation of a Code of Conduct.

³ *Open Space Technology—A User's Guide*: 1992, Harrison Owen. Abbot Publishing. Potomac. Maryland



2. Corporate, Strategic and Operating Planning Processes

It is all too common to find that, while the Vision and Mission of the Corporate Plan flow down through the Strategic and Operating Business Plans of an organisation, the Values Statement of the Corporate Plan stays right there, in the Corporate Plan. One suspects that this phenomenon is due to the risks involved in starting the hares running on ethical and values issues, as mentioned earlier in the discussion of development processes for Codes Of Conduct. However, the Values of the organisation are of central concern to all, as they underpin behaviours toward customers, stakeholders and staff, and the practice of leadership and accountability at all levels of the organisation. In order to embed the Corporate Values in all aspects of the life of an organisation, two pre-requisites are necessary:

- a) The ethical requirements of the Code of Conduct must *cohere with the Corporate Values*. There cannot be two values sets in the field of play, although there may be two or more

expressions of the one value set informing the life of the organisation.

- b) The Corporate Values and the Code of Conduct, if they are worth anything at all, should be seen to *be of strategic worth* and therefore their expression in terms of ongoing cultural change needs must be a key feature of the Business Plans of the organisation at both strategic and workplace levels.

The planning processes of the organisation will then consciously, as a matter of decisions made and resources allocated, be vehicles for the implementation of the principles inherent in the Corporate Values, the general behavioural requirements of the Code of Conduct, and the agreed, applied Ground Rules for ethical standards and practices (in terms of specific ethical behaviours) in every aspect and level of organisational life.

Note that it is not enough to have mere footnotes to the various Business/Operational Plans that, training in Corporate Values and the Code of Conduct will be undertaken, although this is not to say that specific ethics training may not be required. Rather, the process for building and enhancing ethical conduct needs to be integrated into Business Plans so that it is part of how the organisation normally operates — with a developing climate of discussion, dialogue and the enhancement of ethical judgement at every level.

In summary then, effective implementation and maintenance of Codes of Conduct will depend upon integrating that implementation, in an ongoing way with the normal planning processes of the organisation. In this way, a regular review of the ethical culture and health of the organisation is built into normal management processes. As Sinclair notes, ‘Corporate codes which are regularly tested with employees and which adapt to changed circumstances attract a greater sense of ownership and are more robust than more static injunctions by the management team’ (Sinclair, in Coady and Bloch: 1996, 99)⁴

3. Leadership

Both levels of formal leadership, elected and appointed, are vital players in the effective development and implementation of Codes of Conduct. It is the leadership that shapes cultural norms — the way things are done in the organisation — and the leadership must not only participate in the development of the Code of Conduct and take a proper responsibility for managing implementation, but must then be seen to be modelling the values of the organisation in practice. The ethical intention of leaders and their real-time behaviours must be coherent; i.e. leaders must do as they say. Staff and customers will very quickly discern any gap between espoused values’ and ‘values in use’. If that gap between stated values and actual practice begins

⁴ ‘Codes in the Workplace: organisational versus professional codes’: 1996, Amanda Sinclair, Pt 11. Ch5 (*Codes of Ethics and the Professions*; ed Coady and Bloch. MUP

to exceed the levels of normal, acceptable human fallibility, then levels of trust and respect for the leadership will begin to diminish, perhaps to dysfunctional levels. Equally, if employees perceive that the Code of Conduct is designed for the troops and is really only another instrument of power and coercion, they will react with cynicism and passive resistance, or even sabotage.

The Independent Commission against Corruption (ICAC) paper “Ethics: The Key to Good Management” recognises that among the obstacles to improving ethical culture, the following (inter alia) are critical!:

- senior people who only pay lip-service to the vision but do not change their behaviour to reflect it
- performance appraisal systems which do not recognise or reward efforts to make ethical decision-making a priority
- people who are perceived to be unethical being seen to be rewarded
- managers, senior managers and CEO’s who do not really believe that the organisation needs to change or improve its ethical culture, but are undertaking a change program in order ‘to be seen to be doing the right thing’. (ICAC: 1998, 27)⁵

One might add that, in Local Government, the senior people referred to must include elected Councillors, whose leadership and example certainly exerts a major influence on the ethical tone of the organisation.

A senior manager in local government who publicly espoused the values of ‘customer service’, ‘respect for the ratepayers’, and ‘valuing staff’ became notorious in his organisation for hypocrisy. He bent the truth, passed the buck and played favourites, but was always there to claim the glory for a success. He ruled by fear and intimidation, but his reign was marked by ever-diminishing effectiveness as his senior staff began to white ant him. He was eventually asked to move on. A leader who is not respected for ethical integrity at both the personal and organisational levels cannot be an effective leader in the long term.

So it is vital that the leaders of the organisation, who have command of the resources, are prepared to commit themselves personally and in terms of resource allocation to the task of building an ethical organisational culture and modelling the values which will sustain the organisation into the future.

There are two effective strategies for the formation and support of ethical leaders. One strategy is to have regular dialogue within the leadership group, especially at key points of the planning cycle, to shape and refresh the ethical values and practice of the organisation and to ensure that the Code of Conduct remains a live resource for the development of ethical guidance and judgement. The second strategy is to have a mentoring system for leaders, which should be attached to the performance management processes, and which will enable every person in leadership to have an

⁵ *Ethics: The Key to Good Management*; 1998, Lisa Zipparo, Independent Commission against Corruption

independent person with whom they can review their management of the ethical issues within their area of responsibility, perhaps twice per year. These two strategies can be undergirded effectively by periodic reviews of the ethical health of the organisation, including leadership performance.

There is one other important issue for the leadership in Local Government; that of having one Code of Conduct for elected Councillors and another Code of Conduct for the rest of the organisation. This model is in place in a number of Councils and has some attractions in terms of ownership of, and commitment to the Code. However, it does tend to bifurcation or division in terms of one rule for one group, another for the rest. On balance, experience elsewhere indicates that it is better to have one Code of Conduct for the whole organisation, with some additional or supplementary provisions for elected members which concern their relationship with their constituents and also with Council staff. These are two areas of ethical concern which are peculiar to elected officials, but for the rest, the guiding principles of the Code of Conduct for the whole organisation should suffice, and apply to all elected and appointed officials — conflicts of interests, undue influence etc.

This is not a view shared by all, but the history of relationships between elected and appointed officials in all three tiers of government, appears to strongly support the insight discussed above, that there cannot be one set of ethics for one group and another set for the rest. It is that de facto situation that leads to the distrust, loss of respect and a cynicism about the political process which we see evidenced in the electorate today. Incidentally, the Olympic scandal which has unfolded over 1998/99, and the continuing scandals over travel costs at Federal and State levels have served to reinforce cynicism about abuse of the public trust and low levels of probity in government and public organisations.

4. Operational Ethics

Let us now briefly turn to several operational areas where a well developed Code of Conduct can enhance organisational performance.

Procurement and Supply

The Procurement and Supply function in most Local Government organisations is under great stress at the moment because of the imperatives of National Competition Policy. It is also one of the areas of operation most open to fraud and corruption because of the very nature of the engagement and relationship between organisational officials and their suppliers and customers. It is of the utmost importance for this area to have very well defined operating procedures and Ethical Ground Rules in place which safeguard the ethical integrity of the whole organisation. It is critical that Council officers engaged in procurement have a well developed and shared sense of judgement on how to work in the grey areas with which they are often confronted, such as selective tendering, value for money, and partnering with suppliers to enhance required outcomes. However, the impact of less than desirable ethical practice in procurement has very widespread impacts, both internally in Council and also in the wider community. It is short-sighted to ignore the ethical formation of staff in this area of operations, and just as it is important that such staff are well trained to the required levels of competency in the technical aspects of their jobs, it is equally

important to develop their ethical judgement, based on the Code of Conduct which they share with all other members of the organisation. Because of their particular function, there may well be good cause for this group to have several specific additions to the Code of Conduct which address issues peculiar to their area of work, such as the importance of public and organisational accountability in purchasing process. They may also have other provisions added to their Ground Rules such as avoiding social contact with suppliers during tender evaluation and contract negotiation.

Morgan, in a discussion of the nature of organisation culture, suggests that 'organisations are mini-societies that have their own distinctive patterns of culture and sub-culture' (Morgan: 1986, 121)⁶. The sub-culture of procurement and supply departments in local government are certainly distinctive, not least for the close interface which they have with local businesses, especially in smaller rural settings. Their ethical standards are a window for the community into the Council organisation, so the ethical sub-culture of purchasing must be above reproach, as it will inevitably reflect on the ethical reputation of the whole Council. As Wood states the case, 'Buyers can, by their actions, affect the company's profitability and reputation. Many of the issues of ethical concern in business arise within the purchasing function: deception, bribery, price rigging, and public safety' (Wood: 1995, 95)⁷ That such a caution applies to local government is all too obvious.

The last point that should be made about the application of the Code of Conduct to this area of operations is that in developing and implementing their specific application of the Code of Conduct in the form of Ground Rules for purchasing, Council can add weight to the seriousness with which implementation is taken in the rest of the organisation. For instance, every manager and supervisor should be aware of the specific application of the Code of Conduct to the purchasing function, and who better to present the ethical aspects of procurement and supply to managers than the procurement officers themselves. Such an approach will reinforce good ethical practice throughout the organisation, and will demonstrate the practical implications of the Corporate Values and the Code of Conduct.

Human Resource Management

A second area of operations, which has a vital role to play in implementation of Council's Code of Conduct, is the Human Resource Management area. Not only should this area provide an introduction to the Code during induction of new employees, using a senior manager to present the Code in order to highlight its importance to Council. HRM should also live the values of the Code, such as respecting and valuing staff. Such policies as diversity management, staff training and career development, family friendly working conditions and fair and open recruitment and promotion processes will buttress the self-esteem of staff and promote a perception of Council taking seriously the practice of ethical principles, such as respect for persons. Human Resource Management staff can play a significant role in the implementation of the Code of Conduct and maintenance of corporate values by the way they do their job. whether it is providing support and

⁶ *Images of Organisations*; 1986, Gareth Morgan, Sage Publications Ltd, London

⁷ "Ethics in Purchasing: The Practitioner's Experience": Wood, G. in *Business Ethics: A European Review*. vol 4, no 2, pp⁹⁵⁻¹⁰¹

advice and information for staff, or by conducting information sessions on various aspects of HRM, always giving due weight to the ethical issues involved in people management in very diverse organisations, such as Local Government. They are a key resource for the implementation of Council's Code of Conduct.

Customer Service

The Customer Service areas are the public face of Council and it is from their attitudes and behaviour that customers, who are ratepayers and constituents gain their lasting impressions of the operating values of the organisation. It is vital that such staff are not only involved in the development of the Code of Conduct and Ground Rules for their own areas, but that they are also empowered to make those values live in their dealings with customers and each other. Their development as competent and committed customer service officers is critical, and in addition to on-the-job training and dialogue about ethical issues, they need regular development to enhance their performance in communication micro-skills such as dealing with conflict and difficult customers, and making ethical judgements about the multitude of customer needs with which they are presented every day. However, their conduct is profoundly influenced by the example of their supervisors and team leaders, and they will need the commitment of their leaders on the job to support them in contributing to, understanding and applying the provisions of the Code of Conduct in ways that enhance the standing of Council as an ethical organisation. With appropriate support and leadership, your staff will develop as people who not only do things right, but also do the right things for their customers and the organisation. Without their active participation, the Code of Conduct will never be effectively implemented.

There are other operational areas where ethical discernment and judgement are of critical importance. Some of these are dealt with in other contributions in this book, such as Wendy Sarkissian and Andrea Cook's discussion of the ethical milieu of Planning professionals. Suffice it to say that the effective application of Codes of Conduct and practical Ground Rules by such Council staff is of paramount importance for the ethical integrity of the whole Council, and for public perceptions of that integrity. The remarks and suggestions above apply equally to such groups of employees as they do for the operational areas discussed in more detail in this chapter.

Breaches of the Code

If the intention for introducing a Code of Conduct is to punish sinners, then your Code is probably on the wrong track and of little use in achieving an ethical organisational culture. A participatively developed and positively implemented Code, however, will reduce or minimise instances of unethical behaviour, in the experience of many organisations which have taken this path. However, the very existence of a Code means that its provisions will be applied to behaviours, and judgements made on whether or not certain behaviours are in breach of the letter or spirit of the Code. Breaches cannot be ignored and processes for managing breaches must be developed at the same time as the Code itself is developed. Generally, it is a management responsibility to deal with breaches, using the guidance provided by the Local Government Act, the Crimes Act and other applicable public service acts and regulations as they apply to procurement etc., and of course, utilising Council's own Human Resource Management policies.

However, where a breach is detected and proven, it must not be forgotten that management may have to wear some of the responsibility for lack of education, reinforcement and prior corrective action. It may also be the case that a member of management commits the breach. Investigating and taking action where a breach is suspected or alleged to have occurred is a responsibility for the Chief Executive Officer of Council, and a failure to apportion due responsibility to managers involved, or to take the required action against a member of management will bring the Code into disrepute and render it useless as a tool for building an ethical organisational culture, as noted above.

Council's Ethical Profile

The roles of Customer Service Officers, Procurement Officers and Human Resource Management staff and Council leadership have been highlighted because of the impact their behaviour has on staff and public perceptions about the Council organisation as a whole. Of course, these comments apply to all staff of Council, and in the end, the behaviour of all Council officers, elected and staff alike, will be reflected in public perceptions of the ethical integrity and professionalism of the organisation. The deliberate and well-managed development and implementation of a Code of Conduct will make a significant contribution to the ethical culture of any Local Government Authority and will promote relationships of mutual trust and respect between all the major stakeholder groups, between elected and appointed officers, between constituents and elected officials, between customers, ratepayers and council officers, between local business and Council, and last, but not least, between Councils and State Governments.

We certainly can not pretend that the effective establishment and maintenance of a Code of Conduct and Ground Rules for its application will solve all of the problems and meet all the challenges faced by Local Government. However, there is no doubt that a reputation for integrity will stand any Local Government organisation in good stead at every level of its dealings with the community. A well-implemented Code of Conduct is one tool for achieving this desirable end.

By way of a post-script, a number of questions are posed for your consideration, designed to assist you to assess your organisation's readiness for developing and implementing a Code of Conduct.

Questions for Consideration

1. Is there a clear understanding of the legal framework and basis for the establishment of a Code of Conduct in your organisation? If not, are you now able to resource a discussion on the development or re-development of a Code of Conduct in your Council?
2. Is there strong, committed leadership support for the establishment of a Code of Conduct in your organisation? How might such a commitment be engendered?
3. At the present stage of your planning cycle, is there an opportunity to plan for the development, implementation or enhancement of a Code of Conduct, and how can you provide for this to occur?

4. What processes might you put in place to encourage participation, contribution and dialogue which will contribute to the development and implementation of a Code of Conduct, including special provisions for elected members and specialist staff within your organisation?
5. What practical initiatives can you suggest that would enable your organisation to enhance its ethical performance? You might care to consider ways and means of determining staff and community views on the ethical strengths and weaknesses of your Council's operation.