

Good people to do business with

Our code of business ethics



Code of business ethics

Foreword by the Chief Executive

Our vision to be the UK's most respected property business is based on the commercial and sustainable way we manage our unique and diverse portfolio.

As a long-term property owner we combine commercial imperative with an equally firm commitment to integrity and stewardship. However, acting with integrity is more than simply protecting our image and reputation. It's about creating and sustaining an organisation in which we are all proud to work, and recognising the impact of our business within our estates, and on the lives of our tenants and the public. Alongside our association with the Crown and government, these considerations set demanding expectations in how we conduct our business.

This code of business ethics sets the simple and clear guidance for how our colleagues, and our business partners, should always seek to do the right thing, and operate within the highest ethical standards of business for The Crown Estate.

Please read and stay current with the code – it will be regularly updated as changes occur – as we must ensure we are all working together to promote and embody our core values.

Thank you for joining me in this endeavour.

Alison Nimmo
Chief Executive

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Introduction

Why do we need a code of business ethics?

Most successful businesses are successful because they set clear standards that underpin what they believe in and what they aspire to be in being successful.

What is the code of business ethics?

The code of business ethics brings together the basic rules, standards and behaviours necessary to support our business success. It provides clarity about the standards we expect our employees to meet and the behaviours we expect them to demonstrate. These are not just to ensure that we comply with our legal obligations, but to make sure that employees work in a way which is consistent with our core values of Commercialism, Integrity and Stewardship. It is also a common reference point for anyone who is unclear about what is expected of them in a specific situation.

The code of business ethics is a new document however its content is largely a summary of existing legal and policy requirements for working at The Crown Estate with guidance on how to meet these requirements brought together for easy reference.

How can the code help you?

The code of business ethics should act as an initial reference point for employees seeking guidance, advice and answers to compliance issues and expectations of conduct and behaviour. It:

- provides practical advice on how to comply with legal requirements and regulations;
- provides guidance on how you should relate to colleagues, customers, stakeholders, the media and other interested parties including the general public;
- directs you to other useful information sources, including more detailed policy guidance;
- can help you to resolve difficult questions about business conduct and how to obtain confidential advice.

How can you find out more about the code?

Reading the code should give you enough information to handle most situations and questions you will face in your day-to-day work with The Crown Estate. If you want to know more, talk to one of the following people depending on the subject concerned:

- your supervisor, manager or director
- the HR team
- the legal director

Who must follow the code?

Every employee is expected to follow the code of business ethics. Temporary workers employed under contract must also follow the code. Managing agents, contractors or consultants working on our behalf or in our name will be required to act consistently with the code.

How can you report non compliance with the code?

If you believe that a provision in the code of business ethics has been or is being disregarded you have a responsibility to raise your concerns. You can do this through your line management, the policy content owner or internal audit. If you prefer you can raise your concerns via the confidential whistleblowing investigation telephone number 020 7851 5399 or email FraudReport@thecrownestate.co.uk. Your concerns will be taken seriously and investigated quickly. If you wish, your anonymity will be protected. If a proven disregard of our legal obligations or policies is established, appropriate action will be taken.

What could happen to individuals who do not follow the code?

There may be severe consequences, not only for individuals who disregard the provision of the code of business but also for The Crown Estate. Employees who fail to follow the code may be subject to disciplinary action, including termination of employment, and a breach of the code involving a criminal act could result in prosecution.

Bribery & corruption



The direct or indirect offer, payment, advantage, soliciting or acceptance of a bribe in any form is unacceptable.

The Crown Estate has a zero tolerance policy towards bribery; employees must never accept or offer a bribe (financial or non-financial), facilitation payment¹, “kickback”² or any improper payment for any reason.

Acts or allegations of bribery can seriously damage our reputation and any employee who is found to be offering, giving or taking bribes or engaging in any acts of corruption will be subject to disciplinary action, which may ultimately lead to dismissal and, in some cases, criminal proceedings.

Bribery can be briefly defined as the offer, provision, seeking or receipt of an advantage as an inducement or reward for the improper performance of an official or business activity, or in circumstances where it is illegal or improper to offer, provide or seek, or receive the advantage. In all cases, the advantage in question does not have to be money – it could come in other forms such as free travel, hospitality, gifts and offers of employment. Any benefit is capable of being a bribe.

¹ A facilitation payment is a small payment to a public official (of any level of seniority), which is not officially required, to enable or speed up a process which it is the official's job to arrange.

² A kickback is the giving or accepting of money, gifts, or anything of value that is provided in return for favourable treatment and also applies whether the payment is made or received directly or through a third party, such as a managing agent, contractor or joint venture partner.

Dos

- Remember that The Crown Estate could be held liable if any person³ who performs services (or acts) on our behalf bribes another person with the intention of either obtaining or retaining business; or obtaining or retaining an advantage for The Crown Estate in the conduct of our business.
- Exercise prudence when giving or receiving gifts or entertainment (please refer to details of our gifts and hospitality policy).
- Seek advice from your line manager if you are unsure about giving or receiving a gift or anything of value, or providing or receiving entertainment.
- Make sure that when you begin a new business relationship the person you are dealing with understands The Crown Estate's policy on bribery and corruption as part of their induction to our business. Also ask them what steps their organisation has taken to comply with the Bribery Act.
- Include our new Bribery Act clause in all new contracts with entities engaged to act on our behalf⁴. You can obtain a copy of this clause from the legal team.
- Keep accurate records so that payments are honestly described and company funds are not used for unlawful purposes.

Don'ts

- Don't request, receive or agree to receive a financial, or other, advantage with the intention that a function or activity shall be performed improperly or to reward an individual for doing so.
- Don't give, solicit or accept bribes in order to receive a personal benefit or a benefit for your family or friends.
- Don't use third parties to offer or accept bribes, facilitation or kickback payments.
- Don't make political donations on behalf of The Crown Estate.
- Don't make charitable donations on behalf of The Crown Estate without the approval of the legal director.
- Don't offer a financial, or other, advantage to a foreign official with the intention of influencing that official and thereby retaining or obtaining business or an advantage for The Crown Estate.
- Don't do anything to induce or facilitate someone else to break the rules.

Further information

- *Policy and procedure for gifts and hospitality*
- *Policy on the giving of gifts and hospitality*
- *Policy and procedure for managing fraud*
- *Fraud investigation guidelines*
- *Policy and procedure on public disclosure (whistleblowing)*
- *Policy on procurement*

³ For example an employee, agent or joint venture partner.

⁴ Including renewals of existing agreements.

Gifts & hospitality



It is important that gifts or hospitality never influence business decision-making or causes others to perceive they do.

The Crown Estate strictly prohibits employees from soliciting gifts or hospitality and, as a general principle; we discourage employees from giving or accepting gifts. However, The Crown Estate encourages the proportionate acceptance of hospitality as appropriate to good business relationships, but it is equally important this doesn't influence business decision-making processes or cause others to perceive an influence. This means that our policy on gifts and hospitality must take account of the different commercial sensitivities associated with our ownership of assets in both the real estate and energy sectors and this guidance accordingly sets out the maximum discretion afforded to employees.

Prohibited gifts and hospitality

Crown Estate employees are prohibited from accepting or giving the following: illegal gifts; cash or cash equivalents; personal services (excluding volunteering); loans; gifts or hospitality of an inappropriate nature or in inappropriate venues; gifts or hospitality during periods when important business decisions are being made (only to the relevant counterparties).

Gifts

As a general rule employees (in their capacity as employees of The Crown Estate) should not give gifts (other than low value promotional merchandise). Employees should also not accept gifts, except of a token kind e.g. where the value is estimated to be less than £25. Where a gift arrives unexpectedly and the value is estimated at more than £25, but it would be impractical or offensive to return it, then you should enter details of the gift on the online gifts and hospitality register and pass the gift to your director who, will make suitable arrangements for its use within The Crown Estate, or its disposal.

Public speaking or participating in events

Employees can be approached to speak at public events or participate in events where some compensation for time is made. It is not The Crown Estate's policy to charge a fee for providing a speaker at a conference or attending an event.

However, if an unsolicited monetary fee of up to £100 is forthcoming, this should be donated to a charity of the speaker's choice with a declaration included in the online gifts and hospitality register. Anything with a value in excess of this should not be accepted. Payments in kind, for example a box of chocolates, up to a value of £25 can be kept by the speaker for use within their department. Gifts of more than £25 should be passed to your director who will make suitable arrangements for its use within The Crown Estate or its disposal.

Hospitality

Employees must exercise discretion in providing hospitality to, and accepting hospitality from, businesses and individuals. As a general principle routine business lunches are good for building and maintaining relationships, and provided they are not overly lavish they are unlikely to give grounds for suggestions of undue influence or impropriety. It is also an important part of certain roles to attend receptions where people are gathered for business networking, which is relevant to their job at The Crown Estate.

As a business operating in both the real estate and energy sectors we accept that hospitality practices vary from sector to sector and that it is necessary to recognise and accommodate this. One area where practice does vary is the acceptance of invitations to sporting or cultural events. Employees should not accept invitations prior to discussion with the appropriate director/head of department, and in the majority of cases the acceptance of such invitations will not be permitted for employees working in the energy sector.

You are not required to record on the gifts and hospitality register gifts or invitations which you are offered but which you decline. However, where the reason for declining was because you believed that there was a conflict of interest – for example, where you are offered gifts or hospitality from a third party and that third party is participating in a tender process – then a you will need to keep a record of this at departmental level.

Dos



- Report any gifts or hospitality (given or received) of whatever value on the online gifts and hospitality register.
- Make The Crown Estate's policy on gifts and hospitality clear at the beginning of every new business relationship and periodically thereafter.
- Accept invitations provided that they do not conflict with any other points in this section or The Crown Estate's Gifts and Hospitality policy.
- Be aware of the potential conflict of interest if you give or accept gifts or hospitality.
- Ensure that all new employees are made aware of the rules on gifts and hospitality as part of their induction.

Don'ts



- Don't accept or give invitations which are purely social and where networking is not expected to take place or business discussed.
- Don't accept an invitation where you have any doubts – play safe and decline.
- Don't be embarrassed to decline any offer.
- Don't give or accept a gift that you would feel uncomfortable explaining to your work colleagues, your family or the media.
- Don't forget that as a public body we are expected to follow a voluntary code to publish online details of hospitality and business expenses incurred by non-executive board members, and members of the management board and highest paid employees.
- Don't forget that if you accept hospitality, details might be published by your host.
- Don't give or accept hospitality in the immediate lead up to or during a contract tendering exercise.

Further information

- *Policy and procedure for gifts and hospitality*
- *Anti-bribery policy*

Business expenses & use of company credit card (GPC)



Reasonable costs incurred in carrying out your role will be reimbursed.

The Crown Estate will reimburse the cost of travel, accommodation and other expenses necessarily incurred by people carrying out their job responsibilities. It is expected that such costs will be incurred by the most cost effective and carbon footprint efficient means available.

Expenses should be reclaimed as soon as possible through the appropriate business expenses system. Speak to your finance manager for details.

The Crown Estate follows a voluntary code to publish online the business expenses incurred by non-executive board members and members of the management board.

A credit card is available to employees who are required to travel regularly as part of their duties. It is the responsibility of the employee to keep the personal identification number (PIN) and card secure at all times. It is also the responsibility of the employee and line manager to ensure that the expenditure incurred is authorised and that the card is not used to pay for personal expenditure.

The credit card should not be regarded by employees as a 'perk' but is available to ensure that employees are supplied with the means of meeting business expenses without the inconvenience of having to make an expense claim retrospectively.

Further information

- *Policy and procedure for business expenses*
- *Green travel code*
- *Credit card (GPC) guidelines*

Dos



- Ensure you submit any expenses for reimbursement within three months of incurring cost.
- Keep the credit card and PIN secure at all times.
- Follow the instructions given by finance for the use of the card.
- As a manager check thoroughly any GPC forms before approving payment.
- Ensure that you complete and return GPC reconciliation forms.
- Ensure that you return the card to finance if you no longer require it or when your employment comes to an end.

Don'ts



- Don't submit false claims – this could lead to disciplinary proceedings and potentially dismissal on grounds of gross misconduct.
- Don't use a Crown Estate credit card for personal purchases.

Delegated authorities



The Board delegates certain areas of its authority to enable people to take decisions and to allocate resources efficiently within the business at a level which is relevant to their role.

These authorities are given on the presumption that they are used appropriately and never knowingly misused.

Capital expenditure

The following capital expenditure thresholds or authority levels have been agreed by the Board and are reviewed regularly. Further information can be found on i-site or from your finance manager.

Revenue budgets

All directors and heads of department have delegated authority for expenditure within annually agreed revenue budgets and can delegate this authority to appropriate persons within their individual teams. However, there are some exceptions which require authorisation outside of the normal delegated authority rules. These are:

Write offs and special deals on arrears in excess of £50k	Director of finance and IS
Donations	Director of legal
Ex-gratia payments in excess of £250	Director of finance
Research	Management board
Long-term appointments (in excess of one year)	Management board
Transaction of an exceptional, sensitive or controversial nature	Director of finance

Further information

- Purchase to pay policy
- Speak to the finance team for further advice

Dos



- Make sure you know what your delegated authority is before entering into commitments.
- Make sure that any novel or contentious proposals are submitted to the Main Board for consideration having passed through the appropriate approval lines.
- Make sure that anything likely to raise significant reputational issues is brought to the attention of the Chief Executive.
- Make sure that proposals being put to the Main Board have received clearance from the appropriate "vetting" committee, eg. Management Board, SSC, Energy Committee, etc.

Don'ts



- Don't fragment transactions to reduce the level at which authorisation is required.
- Don't exceed your delegated authority.

Conflicts of interest



Crown Estate employees must avoid conflicts of interest between their private activities and their responsibilities in the conduct of Crown Estate business.

A conflict of interest arises when The Crown Estate's business could be affected by personal interest or personal association. It becomes "significant" if a third party might reasonably take the view that your resultant actions might be affected, whether or not they are. As a simple guide to assessing whether a conflict of interest may potentially arise, ask yourself whether you would feel happy explaining any action to your work colleagues, friends or someone in the media?

We respect our employees' right to privacy in their personal affairs and activities. However, it is possible that an employee's personal or family activities may raise an actual or potential conflict with their responsibility to The Crown Estate. Actual conflicts must be avoided, and potential conflicts must be declared and resolved.

Senior employees and those employees engaged in commercially sensitive activities will be required to make an annual declaration of interests and/or complete a specific declaration relating to sensitive commercial activities undertaken by The Crown Estate.

Dos

- Excuse yourself and anyone that works for you from making decisions that may create a conflict of interest with your personal interests.
- Disclose in writing to your director or head of department the relevant facts and explain the circumstances that create or could create a conflict of interest.
- Seek guidance from your director or head of department if you have any doubts about the confidentiality of information or the propriety of your ownerships or dealings.
- Conduct your relationships with business partners, contractors and suppliers in a professional, impartial and competitive manner.
- Be aware that the acceptance of any offer of future employment, consultancy or directorship with a Crown Estate business partner, contractor, customer, and/or competitor constitutes a potential conflict of interest.

Don'ts

- Don't get involved in the recruitment, supervision and/or management of any relative or close personal friends.
- Don't make improper use of your position at The Crown Estate, or of confidential information you have gained, to achieve personal interest or indirect gain.
- Don't allow your relationships with business partners, suppliers or contractors influence business decisions made on behalf of The Crown Estate.
- Don't accept gifts or inducements (including hospitality) that might place you under an obligation.
- Don't invest in a supplier if you have any involvement with their selection, assessment or management.

Further information

- *Policy for managing conflicts of interest*
- *Guidance on the register of interests*

Competition & anti trust



Competition law is a crucial consideration for all businesses in the UK (and Europe more widely). This is the case for The Crown Estate just as much as for any other commercial organisation.

Failure to observe competition rules can have a number of serious consequences for The Crown Estate:

- **Financial** - Non-compliance with competition laws can be very damaging financially - in terms of liability for The Crown Estate to substantial fines, and to damages claims in the courts, as well as the legal invalidity of commercial contracts that are found to breach the rules.
- **Reputational** - Complying with competition law is good business practice. It is important for The Crown Estate's standing and reputation that we should be fully compliant. Non-compliance can be enormously damaging for our reputation and public relations.

The Crown Estate is firmly committed to complying fully with competition laws - and we expect all our employees, in whatever role, to make sure that we do. Conduct that gives rise even to a suspicion of a breach of competition rules, leading to an investigation

by the competition authorities, can be highly problematic in itself - resulting in unnecessary expenditure of our time and resources, when these could be better directed towards developing our business. Failure to comply with competition rules could lead to disciplinary action. In addition, under UK competition law, infringements can also have serious consequences for individuals - including criminal penalties (fines and/or imprisonment) for individuals directly involved in serious anti-competitive behaviour.

Competition rules distinguish between two types of prohibited activities; anti-competitive agreements and abuse of a dominant market position (see page 16).

Anti-competitive agreements

Agreements, arrangements or concerted practices that restrict or distort competition are prohibited under UK and EU competition laws.

Dos



- Limit contact with competitors to the minimum - take a note of any discussion that does take place.
- Feel free to obtain information about your competitors from other sources – internally or from independent industry bodies.
- Object if you become aware of anti-competitive activity. You must make it clear that you will not participate in such discussions, emails etc. If it continues, you must leave the room, remove yourself from the email chain etc and make sure your exit is recorded.
- Inform and consult with The Crown Estate's legal team where you think a danger arises.

Don'ts



- Don't discuss any price-related matter with your competitors.
- Don't agree or reach an arrangement or understanding – or even discuss – with your competitors the possibility of not competing against each other in certain geographic areas, or for certain types of customer, or in the supply of certain services.
- Don't agree or reach an arrangement or understanding with your competitors to limit capacity.
- Don't be involved in situations where your competitors consult on elements of a bid, or on whether or when to participate in the bidding process.
- Don't be involved in any collective agreement or arrangement not to deal with a particular tenant/customer, without first seeking legal advice.
- Don't disclose to your competitors any commercially sensitive information about The Crown Estate's business (eg. rental rates or other pricing information, information about customers, profit margins) .
- Don't seek information about a competitor's business directly from that competitor.
- Don't have informal meetings, sub-meetings at the "margins" or chats on commercially sensitive issues during breaks at industry conferences or trade association meetings.
- Don't become an intermediary or otherwise facilitate exchange of commercially sensitive information between businesses which compete with each other (even if they do not compete with The Crown Estate), e.g. between wind farm developers.
- Don't tolerate anti-competitive information exchange or other anti-competitive activity by The Crown Estate's agents.

Further information

- *Speak to the legal team for further advice*

Avoiding abuse of a dominant market position



Although it is not illegal to have a dominant position, businesses that are dominant must be vigilant and careful in the way they conduct business. As a matter of prudence, The Crown Estate operates on the cautious assumption that it may be dominant in certain areas of business activity.

Further information

- *Speak to the legal team for further advice*

Do's



- Inform the legal team immediately where you think an issue arises, so that they can assess the situation and advise accordingly, or seek external legal advice. It is imperative that The Crown Estate avoids competition law liabilities in this area; it is also important that The Crown Estate is not unnecessarily deterred from legitimate commercial activity upon a mistaken assumption that this may give rise to a competition law issue regarding abuse of dominance.

Don'ts



Broadly, commercial behaviour by a dominant company may amount to an abuse if it either exploits customers or excludes competitors from the market. Do not engage in activities which may give rise to the following:

- **Excessive pricing:** This arises where a price charged by a dominant business is higher than it would be able to charge if it faced effective competition. This may be evidenced by, for example, the selling price being disproportionately higher than costs.
- **Discriminatory pricing or other trading terms:** A dominant business should not apply dissimilar conditions to equivalent transactions with other trading parties, thereby placing them at a competitive disadvantage, unless the differences can be objectively justified (eg in terms of cost differences). In particular, a dominant business should not charge customers different prices for the same product or service, unless there are reasons justifying the difference (eg the customers are not in equivalent positions).

Don'ts



- **“Predatory” pricing (that is, illegitimate below-cost pricing):** A business in a dominant position may not reduce prices below cost in order to eliminate or damage a competitor.
- **Cross-subsidy:** It may be an abuse for a dominant business to cross-subsidise one activity from the proceeds of another activity, even where the subsidised price is not predatory.
- **Rebates and discounts which are abusive:** Dominant businesses must be able to justify the grant of rebates and discounts as reflecting genuine cost savings, rather than an intention to eliminate a competitor - otherwise the discounts will be regarded as abuses (eg. rebates granted should be based on efficiency gains with the customer in question).
- **Refusals to supply products or services:** A dominant business may not refuse to supply an existing customer without a valid reason. If you wish to terminate an existing customer relationship or decline a request to supply a potential new customer, advance guidance should be taken from the legal team.
- **Imposition of unjustified “tying” or “bundling” obligations:** A dominant business should be careful when linking or tying sales of one product or service to a supplementary obligation which has no connection with the main product or service.

Use of confidential information



Employees are likely to acquire confidential information⁵ during the course of their employment at The Crown Estate and are required to exercise care in the use of such information.

Dos



- Seek advice from the legal team if you wish to buy or sell publically listed shares or other securities in a company, which, during the course of your duties, you have or could have had access to confidential information that results in personal gain.
- Ensure that protective markings are applied to confidential information.
- Ensure confidential information is encrypted when shared using electronic devices.

Don'ts



- Don't divulge or communicate confidential information to any unauthorised person.
- Don't use information received during the course of business for personal gain or any purpose except that for which it is given.

Further information

- *Records management policy*
- *Information classification and data handling policy (protective marking)*

⁵ "Confidential information" means trade secrets or information of a confidential nature which is important to and belongs or relates to The Crown Estate which you may have received or obtained as a result of, or in any way in connection with, your employment and includes but is not limited to information relating to commercial, financial or marketing information, customer lists, technical information and know-how comprising trade secrets.

Political activity



As crown servants, special conditions apply to the involvement of Crown Estate employees in political activities.

Employees of The Crown Estate are crown servants and are therefore also subject to specific rules on participating in political activities.

Employees, including the Chief Executive, who are positioned in the senior executive and business delivery manager pay levels are automatically excluded from participating in political activities at a national level, but may participate in local political activities with the agreement of the legal director (in the capacity of company secretary) provided that they comply with any conditions set by The Crown Estate.

Employees covered by estate management and estate operation job families, but excluding those

employees in the senior executive and business delivery pay levels, can participate in political activities at a national and local level but their participation is subject to certain conditions, full details of which are set out in the guidance note.

All other employees may be permitted to participate in national and local political activities with the agreement of the legal director and provided that they comply with the general standards stipulated in the guidance note.

Non-executive board members of The Crown Estate are regarded by the Office of the Commission for Public Appointments as office holders and are not permitted to participate in political activities.

Further information

- *Policy for managing conflicts of interest*
- *Speak to HR for advice*

Dos



- Make sure that you understand which group your appointment relates to and if in doubt speak to your line manager or HR.
- Ensure that you understand the requirements and the need to seek prior permission before entering in to any form of political activity.
- Check before you act if you are in any doubt.

Don'ts



- Don't use your role or business contacts to promote your political views.

Entering into contracts with suppliers



Employees should be aware of the procurement and purchase ordering requirements prior to entering into contracts and ordering goods and services.

The Crown Estate has an overarching corporate procurement policy and a complementary suite of policies and procedures which set out the various arrangements for purchasing goods and services across the business.

Our procurement ethos advocates the use of open and fair competition, the promotion of sustainable business practice, and negotiating the best commercial terms available to us for the goods and services needed. We will only consider compromising these commitments in the most exceptional of circumstances and only when there is a clear and compelling business requirement for us to do so. In the case of doubt seek advice about the procurement process from the procurement manager.

These arrangements ensure that we comply with both best practice and relevant legislative and regulatory obligations. Employees with some responsibility for procurement should familiarise themselves with this guidance and guidance on delegated authority, which can be found on the procurement and finance pages on i-site or on page 11.

Once a contract has been agreed employees must follow the purchase to pay policy, which is the business process used to authorise and manage payments. In the case of doubt, seek advice from your finance manager.

Further information

- Procurement policy
- Construction and project safety policy and (design and management) regulations 2007
- Purchase to pay policy

Dos



- Ensure that you read and understand the procurement policy and appropriate guides if you have responsibility for purchasing goods and services.
- Familiarise yourself with the different competition thresholds and the specific requirements that these impose on any tendering process.
- Liaise with the procurement manager or legal team before you tender for goods or services, which might be wholly or partly funded by public monies as different procurement rules are likely to apply.
- Check with your line manager that you have the appropriate delegated authority to enter into a contract on behalf of The Crown Estate.

Don'ts



- Don't enter into single action tenders without the prior approval of the relevant director.
- Don't forget to action financial approvals when prompted by automated messaging.
- Don't order goods or services from a supplier who is not on The Crown Estate's list of suppliers for temporary staff/contractors.

Legal compliance



Employees should be aware that The Crown Estate operates under restrictive powers and that the legal team should be consulted whenever in doubt.

The Crown Estate Act 1961 governs how we operate and what it is within our power to do, in other words, our *vires*. The terms of the 1961 Act are very restrictive: by way of example, The Crown Estate can only invest in land, it cannot borrow and it cannot grant a lease for longer than 150 years. Consequently, any new structure or transaction needs to be tested against the Act, which will involve careful consideration of the proposals alongside the provisions of the Act, by the internal legal team. Please contact the legal team at the earliest opportunity to ensure that any *vires* issues can be cleared before the matter is taken too far and costs/time are wasted. The legal team will be responsible for instructing external legal advisers in these circumstances.

Routine transactions are managed by our external panel of lawyers. For the most part, the internal legal team will not get involved in those routine matters, but will be involved in more complex transactions alongside the external lawyers, whether those transactions contain questions of *vires* or not. Do note, however, that the legal team is always happy to advise on any legal queries which arise in relation to any matter.

Any papers seeking authorisation for any transaction from committees and boards must receive legal sign-off before they are submitted to the secretariat for the committee or board in question. This applies at each level ie a paper going to Stock Selection Committee, but which will then be adapted for the Main Board, will need legal sign-off at both levels and not just once at Stock Selection level.

Further information

- *Speak to the legal team for further advice*
- *The Crown Estate Act 1961*

Dos



- Consult the legal team whenever in doubt as to *vires* matters or any other legal query.

Don'ts



- Don't submit any relevant board or committee paper without first obtaining legal sign-off.

Financial compliance



Employees should be aware that The Crown Estate is required to comply with a range of financial standards.

The Crown Estate is required to prepare accounts in compliance with International Financial Reporting Standards (IFRS) and The Crown Estate Act 1961. All employees must ensure that they comply with the relevant finance policy and procedures to ensure that any financial transactions with which they are involved, eg purchases and sales of properties, income recognition, are dealt with in accordance with these standards. In the case of doubt seek advice from the appropriate finance manager.

As a VAT registered supplier, The Crown Estate is required to comply with value added tax (VAT) regulations and any reporting requirements set by Her Majesty's Revenue and Customs (HMRC). Employees should

ensure that the correct VAT treatment is applied to financial transactions. In the case of doubt seek advice from your finance manager.

Under the Construction Industry Scheme operated by HMRC, The Crown Estate is considered to be a contractor and is required to make pay as you earn (PAYE) deductions and report to HMRC suppliers of goods and services deemed to be within the scheme. Employees who are required to order goods or services from suppliers within the scheme should be aware of the HMRC requirements and ensure that their suppliers comply.

Further information

- *Procurement policy*
- *Speak to the finance team for further advice*

Dos



- Contact the relevant finance manager if you are unsure of the financial treatment of a transaction.

Don'ts



- Don't seek external advice on the financial treatment of a transaction without referring to the finance department.

Money laundering



Employees must be aware of the risk to The Crown Estate's reputation of money laundering and be aware of the anti-money laundering procedures and best practice requirements as outlined in the Anti-money Laundering Policies and Procedures.

Money laundering is the practice of disguising the origins of illegally-obtained money and applying a process by which the proceeds of crime are made to appear legitimate. The money involved can be generated by any number of criminal acts, including corruption, accounting and other types of fraud.

Employees who are involved in the types of transactions which may expose The Crown Estate to the risk of money laundering should be aware of the counter measures in place to mitigate the risk.

These transactions could be those involving significant cash receipts, leases of properties to offshore companies or trusts where it is difficult to ascertain the identity of the

ultimate principal, lease of property to an individual whose source of wealth is known to be the proceeds of crime or corruption or whose source of wealth is unclear.

In order to counteract any risk, employees involved with such transactions should ensure that they are fully aware of the procedures and that the third parties involved in the transactions, managing agents and lawyers verify the counterparties involved in the transactions as required under the procedures.

Further information

- *Speak to the finance team for further advice*

Dos



- Understand the risk involved and follow the procedures where relevant.
- Raise any suspicions about a prospective counterparty to the director of finance and IS.

Don'ts



- Don't assume that third parties involved in transactions have The Crown Estate's best interest at heart but do what is necessary to preserve the reputation of The Crown Estate.

Donations to charities



Under the Crown Estate Act 1961 special conditions exist for the making of donations to charitable bodies.

We are allowed to make charitable donations but only in very limited circumstances. We can make contributions (in money) from The Crown Estate's income for any religious or educational purpose connected with land of The Crown Estate, or for other purposes connected to the welfare of persons either residing or employed on any such land. During the course of your employment you may be approached by a charitable body requesting The Crown Estate make a donation.

Since the occasions when a donation will be permitted under the Act are so limited, the general presumption should be that we can't make the donation. However, if there is a robust business reason for doing so and it falls under the above criteria then seek approval from the legal director.

Further information

- [The Crown Estate Act 1961](#)
- [Anti bribery policy](#)
- [Gifts and hospitality policy](#)

Dos



- Ensure all requests (whether or not granted) for donations to charitable bodies are brought to the attention of the relevant director.
- Ensure that the legal director has been supplied with a reasoned business case for making the donation and has approved the donation before the payment is agreed in principle (or just for general guidance).
- Ensure that where you give a charitable donation (of whatever value) you report such donation on the online gifts and hospitality register.

Don'ts



- Don't make promises (or even suggestions of promises) to charitable bodies not connected with The Crown Estate.
- Don't delegate the authority to pay donations on our behalf to managing agents or any other third party.

Consequences of misconduct



Our reputation is very important to us and we expect the utmost professionalism from our employees at all times.

The Crown Estate has clear expectations about the way in which employees and other persons representing our business should behave. These are regularly communicated through our corporate policies and procedures, including those described in this code, and are additionally reinforced through regular conversation with people, including our performance management arrangements.

Persistent failure to meet our standards of conduct will result in disciplinary action up to and including termination of employment. Very serious breaches may result in dismissal for gross misconduct, which means your employment could be terminated without prior warning. These arrangements apply to employees at all levels in the business regardless of their position.

As a guide we consider the following actions to amount to general misconduct⁶: significant and/or persistent poor performance; persistent bad timekeeping; poor attendance; unauthorised absence; minor damage to our property; failure to adhere to our procedures; abusive or threatening behaviour; bringing the business into disrepute; failing to disclose pending criminal charges or convictions (not covered by the Rehabilitation of Offenders Act); persistent behaviour which contravenes the values of the business; unreasonable refusal to follow an instruction issued by a manager or supervisor; and minor breaches of the code of business ethics.

The following list provides a guide⁶ as to the following actions to amount to gross misconduct: theft, fraud or offences under the Bribery Act (bribing another person, being bribed, bribing a foreign public official or failing to prevent bribery); unauthorised disclosure of company documents, and other confidential information to unauthorised third parties; unlawful discrimination or harassment; the use or distribution of illegal drugs while on the company's premises; indecency; bringing the business' reputation into serious disrepute; intentional and reckless disregard for safety and safety rules; provoking or participating in any form of violence at work; threatening, abusive or offensive language or behaviour towards colleagues, customers or suppliers; persistent refusal to carry out a reasonable instruction; gross insubordination or wilful misconduct; behaviour which seriously contravenes the values of the business; deliberate falsification of information or documents; failing to disclose serious pending criminal charges or convictions (not covered by the Rehabilitation of Offenders Act); deliberate damage to our property; and serious breaches of the code of business ethics.

Line managers, with advice from HR, are responsible for determining any appropriate disciplinary action. Breaches of our legal responsibilities may also result in civil or criminal action being taken against employees and others who represent our business.

Dos



- Ensure that you are familiar with the contents of this code, and the relevant policies and procedures applicable to your position.
- Encourage people to meet our expectations.
- Be a role model for others.

Don'ts



- Don't be afraid to ask for clarification from your line manager or HR if you are in any doubt about our expectations.

Further information

- *Disciplinary policy*
- *Performance management policy and procedure*
- *Speak to the HR team for further advice*

Diversity



The Crown Estate is committed to promoting and maintaining an environment where employees, business partners, stakeholders and customers are treated equally, fairly, with dignity and respect.

We will not allow consideration of age, colour, disability, ethnic origin, marital status (civil partnership), nationality, race⁷ religion or belief, sex, sexual orientation, pregnancy or gender reassignment to influence decisions that relate either directly or indirectly to the recruitment, advancement, benefits, training or treatment of any employee.

Further information

- *Equal opportunities and diversity policy*
- *Grievance procedure*

Dos



- Ensure that any employment-related decisions, including appointment, performance review, promotion, training, discipline, development and termination of employment, are determined by merit and business considerations alone.
- Ensure that you demonstrate respect and fairness in your dealings with employees and external parties.
- Ensure you report any concerns.

Don'ts



- Don't tolerate unlawful discrimination of any kind.

Harassment and bullying



The Crown Estate will not tolerate harassment or bullying – that is any action, conduct or behaviour which any individual or group of individuals finds unwelcome, humiliating, intimidating or hostile. Employees must, therefore, avoid actions or behaviours that are, or could be, viewed as harassment.

Although our property assets are located in the UK we engage with a diverse range of people from different cultures. Although we wouldn't want to stifle "fun", employees should be particularly sensitive to actions or behaviours that may be acceptable in one culture but not in another, particularly when on business outside of the UK.

Further information

- *Grievance procedure*
- *Disciplinary policy*
- *Policy on use of IT*

Dos



- Treat all colleagues, suppliers, customers, stakeholders and visitors with respect.
- Find out about local behaviours, practices and customs that may differ from those you are used to, be sensitive to differences and be prepared to adapt your behaviour accordingly if travelling in another country.
- Speak up and tell a person if you are upset by his or her actions or behaviour, explain why and ask them to stop.
- Listen to feedback from others.
- Speak to your line manager or HR if the harassment continues.
- Use an informal approach to try to resolve the issue where appropriate before raising a formal grievance.
- Use the formal grievance procedure if the matter is serious or the informal approach is not successful.
- Consider the tone and presentation of emails and how others might interpret your meaning.

Don'ts



- Don't behave in an unwelcome, humiliating, intimidating or hostile manner.
- Don't make inappropriate jokes and comments.
- Don't distribute or display offensive material, including inappropriate pictures or cartoons.
- Don't spread malicious rumours or use email, voicemail or other electronic media to transmit derogatory, harassing or abusive information.

Maintaining a professional image



Personal appearance can influence what people think about you and our business.

The Crown Estate expects employees to project a professional appearance. This means dressing in an appropriate manner. Naturally, employees are expected to be clean and of neat appearance at all times.

For office-based employees, flip-flops, casual boots, jeans and denim clothing, casual t-shirts, leggings, combat trousers, shorts, sports or beach wear, stretch Lycra, trainers, sweatshirts and tracksuits, and clothes which are unnecessarily revealing and could cause embarrassment to others are, in most cases, not appropriate. Some employees working in positions such as facilities or

information systems which require them to be more physically active – moving furniture or carrying equipment for example – may find more durable smart clothing more appropriate. However, this will be subject to line management discretion.

Most estate employees are supplied with a uniform, which must be worn whilst on duty and worn only to and from work at all other times.

Protective clothing/equipment is also supplied for certain work-related activities to comply with health and safety standards, and must be worn at all times.

Further information

- *Speak to Health & Safety or your line manager about protective clothing/equipment*

Dos



- Dress in a way that is neat and tidy in appearance, and appropriate for your position and part of the business.
- Wear any protective clothing that is issued to you.
- Carry your Crown Estate ID badge at all times.

Don'ts



- Don't wear inappropriate clothing whilst at work.

Business etiquette



The way a person interacts, or is perceived to interact, with others can create – whether fairly or not – an image of that individual. Small things that might otherwise go unnoticed can often make the difference between being viewed as professional or not.

Further information

- *Our customer standards*

Dos



- Ensure you get to meetings on time – don't make others wait for you.
- Ensure you're prepared for meetings.
- Return phone calls and emails promptly.
- Greet colleagues.
- Respect the opinions and decisions of others, even if you disagree with them.
- Ensure your conversation is conducted in an appropriate venue if it is business sensitive or personal.
- Switch off mobile phones/Blackberries during meetings. If you are expecting an urgent call or email, please ask the chair's permission to be excused before the meeting commences.
- Keep your language appropriate in the workplace.
- Refrain from gossiping.

Don'ts



- Don't hold personal, sensitive or confidential conversations in earshot of others.
- Don't interrupt when others are speaking.
- Don't monopolise conversations.
- Don't answer mobile phones or answer emails during a meeting.
- Don't chew gum during meetings.
- Don't forget to be polite – a simple "please" and "thank you" can make a big difference.
- Don't leave your mobile phone switched on if you're away from your desk. Switch it to silent or vibrate mode.

Customer management



Paying attention, understanding and responding to what our customers want or the types of problems they're experiencing is critical to a successful and sustainable business.

In these challenging times, it is more important than ever for The Crown Estate to maintain good relationships with customers as our reputation and business success depend upon us being considered great people to do business with - who are always helpful, efficient and fair.

Further information

- *Customer complaints procedure*
- *Our customer standards*

Dos



- Take responsibility for seeing things through and reporting on progress to the customer.
- Help customers to articulate their needs and be proactive in looking for solutions.
- Return phone messages and respond to emails promptly.
- Meet deadlines agreed and if you are unable to let the customer know well in advance of any delay.
- Produce information which is accurate, up to date and in a useful format.
- Treat people politely.
- Respect confidentiality.
- Always try to be helpful, efficient and fair.
- Make sure that people are properly briefed about the service you require and your expectations as a customer.
- Make yourself accessible to customers.
- Speak with a smile in your voice when on the telephone – it can't be seen but it can be heard!

Don'ts



- Don't ignore poor customer service – challenge it constructively.
- Don't forget to apply your out of office assistant or voicemail when you're not available (office-based employees).
- Don't ignore ringing telephones.
- Don't disregard customer feedback.

Drugs & alcohol



The use of alcohol and drugs (including certain types of prescription medication) within the workplace can increase the likelihood of injury through impaired judgement.

As a consequence employees are reminded of the following:

- Employees must not report for work in an impaired condition.
- The use, supply or possession of illegal drugs within the workplace is prohibited.
- Employees must ensure that any prescribed medication does not impair their ability to complete their duties in a safe manner – especially when driving operation or using plant and machinery – and inform their line manager of any restrictions or controls.
- Employees with drink or substance abuse issues may seek help and advice from our employee assistance programme.
- Employees are responsible for ensuring that they adhere to national drink drive limits and are advised to refrain from drinking if they plan to drive.
- Where medication is issued to control an existing condition, it is the responsibility of the employee to ensure that this medication is taken so as to prevent ill-health or injury.
- Employees working in safety critical environments are not permitted to drink whilst on duty or whilst in control of equipment.

Failure to comply with these requirements may result in disciplinary action.

Further information

- *Care first - (our employee assistance programme)*
- *Disciplinary policy*
- *Speak to HR for further advice*

Do's



- If you suspect someone is under the influence of drugs or alcohol, report it.
- Tell your line manager if you are on medication.

Don'ts



- Don't come to work if you have been drinking.
- Don't allow others to work or operate machinery if you suspect they are under the influence of drugs and alcohol.

Social media



Social media is an increasingly popular, fast and influential way of communicating with people. However, care needs to be taken not to represent The Crown Estate's views, or to make inappropriate or offensive comments which could be attributed in some way to The Crown Estate.

The Crown Estate does not currently subscribe corporately to social networking or content sharing sites but does recognise that employees may choose to be members of professional or social networking sites, including twitter, linkedIn, facebook etc.

Employees are advised not to make reference to The Crown Estate, their employment at The Crown Estate or post any comments which would identify our business or persons working for or on our behalf on social networking or content sharing websites eg youtube and flickr. Employees are permitted to join professional networking sites and give details of their employment with The Crown Estate for business purposes.

Always remember that participation in online sites will result in your comments being permanently available and open to being published in other media.

Also be aware that you may attract media interest personally so proceed with care. If you have any doubts, take advice from your line manager or the communications department.

Employees should not post messages that contain photos, software or other material protected by intellectual property rights of The Crown Estate. Stay within the legal framework and be aware that libel, defamation, copyright and data protection laws apply.

Further information

- *Speak to the communications team for further advice*

Do's



- Exercise caution if you are a member of or plan to join a social networking site.
- Know and follow The Crown Estate's code of business ethics.
- Be personally responsible for the content you publish on blogs, wikis or any other form of user-generated media. Be mindful that what you publish in a personal capacity will be public for a long time.
- Respect copyright, fair use and financial disclosure laws.

Don'ts



- Don't make reference to your appointment at The Crown Estate on social networking sites or content sharing sites.
- Don't allow your online activities to interfere with your job, your colleagues or commitments to customers.

Dealing with the media and other stakeholders



The Crown Estate and its property assets are of increasing interest to the media and other stakeholders.

The Crown Estate is regularly approached by members of the media and stakeholders for information. All media enquiries must be directed to the communications department so they can keep a log of all press enquiries and ensure a consistent message is given to journalists. Even if you are familiar with the journalist or you know the answer to the enquiry it must be directed to the communications department first.

Correspondence or requests for information from MPs, MEPs, regional assembly members and the like must be referred to the Chief Executive office in the first instance.

Non-routine enquiries for information covered, or that may appear to be, covered by the Freedom of Information Act or the Data Protection Act must be forwarded to the knowledge manager. They will be dealt with in accordance with our standard Freedom of Information and Data Protection Act policies and procedures.

Care should also be taken when speaking to external parties. Avoid talking about matters where an inadvertent slip of words might lead to disclosing confidential or commercially sensitive information.

Further information

- *Speak to the communications team for further advice*

Dos



- Refer all enquiries to the communications department even if you are experienced in speaking to the media.

Don'ts



- Don't say anything that you would be embarrassed to see in print, particularly during external events.

Safety, health, and environment



The Crown Estate believes that the management of safety, health and environmental risks are an important and integral part of its business activities. All our employees are responsible for promoting and visibly demonstrating a positive safety culture based on shared values, beliefs and expected behaviours.

These values and expected behaviours are outlined in our corporate statement of intent:

It is the policy of The Crown Estate, so far as reasonably practicable, to protect the environments in which we operate and ensure the safety and health of our employees and others exposed to the hazards created by our activities.

To enable this and support our aim to improve our performance, this policy sets out our integrated approach to safety, health and environmental management.

To achieve these aims we will:

- develop suitable systems and controls that clearly identify roles and responsibilities throughout the organisation;
- identify our relevant duties and obligations stipulated by corporate, voluntary and legal requirements;
- identify the significant safety, health, and environmental risks (including polluting activities) presented by our activities and where reasonably practicable to do so, eliminate those risks or mitigate their impact;
- review and maintain relevant employee knowledge and skills to ensure their continued competency in the management of identified risks;
- ensure that employees are aware of and have access to relevant controls measures including training, suitable equipment and relevant safety documentation that enables them to work in a safe manner;
- implement control procedures for managing emergency situations;
- identify and utilise suitable and effective media in which to communicate with our employees;

- develop monitoring and measurement systems to assess performance and identify learning opportunities from events with unexpected outcomes;
- implement suitable reporting structures and lines of communication to enable a ready flow of information throughout the organisation;
- integrate safety, health and environmental management and 'safe systems of work' into our daily activities and behaviours;
- develop and maintain good relationships with employee representatives, trade unions, regulatory bodies and other stakeholders;
- work with our suppliers and business partners to improve understanding, impact and overall performance;
- provide sufficient resources to support the implementation and safe delivery of this policy; and
- establish an annual process for the review of the safety, health and environmental management systems, including this policy statement.

We recognise that compliance with this policy and associated management systems alone may not be enough to protect the environments in which we operate and ensure the health and safety of our employees and others exposed to the hazards of our activities. Therefore we will communicate our policies in a positive and consistent manner, and actively seek employee feedback on the effectiveness of these controls to enable us to conduct our business in a considerate and diligent manner.

We believe that it is the responsibility of all our employees to promote and visibly demonstrate a positive culture towards safety and protection of the environment based on shared values, beliefs and expected behaviours.

Dos

- Make sure that you are aware of the policies and procedures that have been developed to control business risks and ensure that you adhere to these control measures.
- Assist the business in complying with its legal and voluntary obligations by following the reasonable requests of your line manager or the health and safety manager.
- Follow the requirements of any risk assessments or safe operating procedures applicable to your role.
- Report all accidents, incidents and environmental incidents to your line manager.
- Report all hazards, malfunctioning and defective equipment and machinery, and unsafe conditions immediately to your line manager
- Use all personal protective equipment as directed by manufacturers instructions and as identified by risk assessment.
- Use appropriate safety devices applicable to your job, and maintain the equipment in good order reporting any unserviceable equipment or controls immediately to your line manager.
- Undertake the appropriate and necessary training for you to carry out your job in a competent and safe manner.
- Ensure familiarity and compliance with the emergency procedures applicable to your place of work and job.

Dos

- When in doubt over matters affecting safety, health and environmental management seek guidance from your line manager or a safety representative.
- Put forward suggestions concerning safety, health and environmental management to either your line manager or a safety representative.

Don'ts

- Don't take shortcuts.
- Don't intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare.
- Don't ignore health and safety - a failure to comply with any of the above requirements could result in disciplinary action being taken.

Further information

- *Safety, health and environmental procedures of control (held on Wisdom)*
- *Speak to the health and safety team for further advice*

Personal Safety



As stated within the previous sections, The Crown Estate has a range of policies and procedures that are aimed at preventing injury, however it is the responsibility of the employee to adhere to these controls and highlight any gaps in control.

Employees must ensure that they have been made aware of the control measures that have been developed for the tasks that they are required to complete, including emergency actions.

This is of particular important in the following circumstances:

- When using dangerous plant, equipment or substances
- When working alone
- When travelling on business
- When working in dangerous locations

In these circumstances it will be necessary to develop specific risk assessments with your line manager and/or the health and safety manager.

These assessments will identify the specific hazards associated to the tasks and the management controls that will be applied to remove or reduce the risk.

Further information

- *Safety, health and environmental procedures of control (held on Wisdom)*
- *Speak to the health and safety team for further advice*

Do's



- Identify control procedures related to your activities.
- Adequately plan tasks and ensure that all control measures have been implemented in full.
- Raise any concerns with your line manager.
- Update plans and controls if circumstances change.
- Ensure that you are fully aware of emergency arrangements.
- Be aware of your surroundings and the risks that they may pose.
- Stop a task or activity if you are concerned about safety.

Don'ts



- Don't place yourself in potentially risky situations.
- Don't disregard risk assessments, control arrangements or direct instructions.
- Don't operate beyond your level of competence.

Information management



The Crown Estate needs good records to run the business, therefore employees must keep a record of what they do on behalf of The Crown Estate.

The Crown Estate is subject to a variety of legislative and regulatory controls regarding its information, including The Public Records Act, Freedom of Information Act, Environmental Information Regulations, Data Protection Act and the Security Policy Framework. We also maintain ISO27001 accreditation for information security. However, the most important driver for good information management is that we need good

information to run a successful business. It is the responsibility of every employee to record what they do for The Crown Estate. Heads of business units also have overall responsibility for the information generated or used in their department.

Further information

- *Records management policy*
- *Information classification and data handling policy (protective marking)*
- *Data Protection Act policy*
- *Speak to the knowledge management team for further advice*

Dos



- Make sure that you save all corporate information in our Wisdom record system.
- Mark any sensitive documents with an appropriate protective marking.
- Ensure that you return paper files as soon as you have finished with them, and don't pass them on to someone else without first transferring your responsibility with the knowledge management team.
- Make yourself aware of your data protection and freedom of information (FOI) responsibilities.
- Ensure that you destroy or delete trivial, transient, personal or inappropriate items.
- Refer any data protection act (DPA) or freedom of information requests to the knowledge manager.
- If in doubt, ask before you act.

Don'ts



- Don't save corporate information where only you can access it eg your personal drive, laptop hard drive, Outlook inbox/ personal folders or desk drawer.
- Don't send Crown Estate or national archive paper files out of the office without first checking with knowledge management.
- Don't send unencrypted electronic information out of the building. Never send CDs or DVDs and ensure USB sticks are encrypted.
- Don't leave confidential, sensitive or commercial information unattended – store it securely when not in use.

Security



The Crown Estate increasingly conducts significant amounts of business which is of a commercially sensitive nature and of interest to others. It is imperative that all reasonable measures are taken to protect access to this information.

Further information

- *ISMS policies and guidance*
- *Speak to the IS team for further advice*

Dos



- Ensure you keep your password secure. If you think someone else may know it, change it!
- Make sure you report anything unusual about any electronic equipment issued to you.
- Ensure that you understand your responsibilities under the Data Protection and Freedom of Information Acts.
- Ensure that sensitive/critical data is encrypted before transit.
- Ensure that if you are responsible for managing outsourced contracts, suitable arrangements for data exchange are in place with third parties where personal data of a sensitive, critical, or valuable nature is exchanged.
- Lock away mobile IT equipment outside normal hours of business.
- Remember to take extra care if working in public places – ensure that what you're working on can't be overseen.
- Take care not to mention names of companies or people when conducting conversations in public places where you could be overheard.

Don'ts



- Don't disclose your password to anyone.
- Don't install software on Crown Estate IT equipment.
- Don't store records on the C drive of your computer.
- Don't use your business email account for personal gain.
- Don't use external email accounts (eg hotmail, yahoo, AOL) to conduct Crown Estate business.
- Don't allow visitors unescorted access around working offices.

www.thecrownestate.co.uk

London

The Crown Estate
16 New Burlington Place
London
W1S 2HX
T 020 7851 5000

Edinburgh

The Crown Estate
6 Bell's Brae
Edinburgh
EH4 3BJ
T 0131 260 6070

Windsor

The Crown Estate
The Great Park
Windsor
Berkshire
SL4 2HT
T 01753 860 222



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