



Criminal Cases Review Commission

ORGANISATION POLICY

Policy Title: **Code of Conduct for Staff**

Reference: **CCRC-POL-01**

Version: **1.0**

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Foreword

The Criminal Cases Review Commission (CCRC) was established as a body corporate under the [Criminal Appeal Act 1995](#) (the Act) from 1 January 1997. The CCRC was established under the Act to investigate possible miscarriages of justice in the criminal courts of England, Wales, and Northern Ireland, and in the Court Martial and the Service Civilian Court; and to refer appropriate cases to the relevant appeal court.

Provisions in relation to the composition, functions, powers, and duties of the CCRC are contained in sections 8 to 25 inclusive, and Schedule 1, of the Act.

This Code of Conduct (revised as of February 2025) sets out clearly and openly the standards expected of the CCRC's staff. This Code sits alongside a suite of CCRC HR and corporate policies and documents.

Any questions on this Code should be directed to:

Chief Executive
Criminal Cases Review Commission

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23 Stephenson Street
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All Commissioners and Independent Non-Executive Directors are subject to [CCRC-POL-04 Code of Conduct for Commissioners and INEDs](#)

For [Definitions](#) please see the end of the document.

1 Introduction

- 1.1 This Code of Conduct applies to all employees unless otherwise stated. It is your responsibility to ensure that you are familiar with, and comply with, all the relevant provisions of this Code.
- 1.2 All Commissioners and Independent Non-Executive Directors (INEDs) are instead subject to [CCRC-POL-04 Code of Conduct for Commissioners and INEDs](#).

2 Key Principles of Public Life

- 2.1 The key principles upon which this Code is based are the Seven Principles of Public Life.¹ These principles, set out below, must inform your actions and decisions:
- a) **Selflessness** - You must take decisions solely in terms of the public interest. You must not do so in order to gain financial or other material benefits for yourself, your family, or your friends.
 - b) **Integrity** - You must avoid placing yourself under any financial or other obligation to outside individuals or organisations that might, or might be perceived to, influence you in the performance of your official duties.
 - c) **Objectivity** - In carrying out public business, including awarding contracts and recommending individuals for rewards and benefits, you must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

¹ *Standards in Public Life: First Report of the Committee on Standards in Public Life*. Volume 1: Report. CM 2850-I. These are also called the '[Nolan Principles](#)'.

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- d) **Accountability** - You are accountable for your decisions and actions to the public and must submit yourself to whatever scrutiny is appropriate for your office.
- e) **Openness** - You must be as open as possible about the decisions and actions that you take. You must give reasons for your decisions and restrict information only when the wider public interest clearly demands.
- f) **Honesty** - You must be truthful. You have a duty to declare any private interests relating to your public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- g) **Leadership** - You must promote and support these principles by leadership and example.

3 General Conduct

3.1 Use of Public Funds

You have a duty to ensure the safeguarding of public funds² and the proper custody of assets which have been publicly funded. You must carry out these obligations responsibly – that is, take appropriate measures to ensure that the CCRC uses resources efficiently, economically, and effectively, avoiding waste and extravagance. It will always be an improper use of public funds for public bodies to employ consultants or other companies to lobby Parliament, Government, or political parties.

3.2 Allowances

You must comply with the rules set by the CCRC regarding remuneration, allowances, and expenses. It is your responsibility to ensure compliance with all relevant HM Revenue and Customs' requirements concerning payments, including expenses. See [FIN-POL-01 Travel and Subsistence Expenses Policy](#) and [FIN-POL-02 Non-Travel Expenses Policy](#) for further information.

3.3 Gifts and Hospitality

² This should be taken to include all forms of receipts from fees, charges, and other sources. For more guidance on how to handle public funds, please refer to Managing Public Money <https://www.gov.uk/government/publications/managing-public-money>

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You must comply with the rules set by the CCRC on the acceptance of gifts and hospitality (see [HR-POL-08 Gifts & Hospitality Policy](#)).

3.4 Use of CCRC Powers and Resources

You must not misuse CCRC powers or resources³ for personal gain or for political purposes. Use of any CCRC powers or resources must be in line with the CCRC's rules on their usage.

3.5 Use and Disclosure of Information

3.5.1 You must not misuse information gained in the course of your work at the CCRC for personal gain or for political purposes.

3.5.2 You must have regard to [Sections 23 and 24](#) of the Criminal Appeal Act 1995. The duties imposed by those sections continue to apply after you have left the CCRC.

3.5.3 Similarly, you must have regard to the provisions of the Data Protection Act 2018 and UK GDPR.

3.5.4 You must not disclose without authority any information which is confidential in nature or which is provided to you in confidence. This duty also continues to apply after you have left the CCRC. For these purposes, all information which is provided to you in the performance of your duties must be presumed to have been provided to you in confidence.

3.6 Employment and Appointments

If an employee wishes to take up additional employment, either paid or voluntary, during their employment, you must receive written consent from the CCRC by completing a [HR-F-14 Declaration of Financial and Other Interests](#). You must refer to your contract of employment and this Code of Conduct.

4 **Conflicts of Interest**

4.1 You must ensure that no conflict arises, or could reasonably be perceived to arise, between your public duties and your private interests, financial or otherwise.

³ This includes facilities, equipment, stationery, telephony, IT, and other services.

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- 4.2 You must also ensure that no conflict of interest and/or bias (actual or perceived) arises or could reasonably be perceived to arise, in your conduct of casework or casework decision-making. [CW-CGN-09 Conflicts of Interest in Casework](#) provides more detail on this.
- 4.3 You must comply with the rules of the CCRC on handling conflicts of interests set out [HR-POL-22 Declaration of Financial and other Interests Policy](#).

These require you to declare publicly any private interests which may, or may be perceived to, conflict with your public duties⁴. The rules also require you to remove yourself from the discussion or determination of matters in which you have a financial interest. In matters in which you have a non-financial interest, you must not participate in the discussion or determination of a matter where the interest might suggest a danger of bias.⁵

It is your responsibility to ensure that you are familiar with the CCRC's rules on handling conflicts of interests, that you comply with these rules, and that your information is accurate and up-to-date.

5 Responsibilities

- 5.1 You must work to the highest personal and professional standards and play a full and active role in the work of the CCRC. You must at all times act in good faith, responsibly and in the best interests of the CCRC.
- 5.2 You must promote an inclusive and diverse culture in the organisation and your actions must help create an environment where different perspectives and backgrounds are encouraged and valued.
- 5.3 You must deal with the public and their affairs fairly, efficiently, promptly, effectively and sensitively, to the best of your ability. You must not act in a way that unjustifiably favours or discriminates against particular individuals or interests, you must make efforts to understand people's needs and make reasonable adjustments accordingly.

⁴ In general, all financial interests should be declared. When considering what non-financial interests should be declared, you should ask yourself whether a member of the public, acting reasonably, would consider that the interest in question might influence your words, actions or decisions.

⁵ These are common law provisions.

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- 5.4 You must not harass, bully or act inappropriately towards or discriminate towards others. Such behaviour is not consistent with what is expected of an employee and will not be tolerated.
- 5.5 You must comply with the statutory and administrative requirements relating to your post.
- 5.6 You must not use, or attempt to use, your role at the CCRC to promote your personal interests or those of any connected person, firm, business, or other organisation.
- 5.7 You must inform your manager of any change in your circumstances which results in you becoming bankrupt, subject to a police investigation, convicted of a criminal offence, or disqualified from being a company director.
- 5.8 Communications between the CCRC and ministers at the Ministry of Justice will normally be through the Chairman or the Chief Executive. Before an employee makes an individual approach to a minister, you must seek the agreement of the Chief Executive.

6 Colleagues

- 6.1 You will treat colleagues with courtesy and respect and you must not ask or encourage a colleague to act in any way which would conflict with this Code, nor ask or encourage a Commissioner or INED to act in any way which would conflict with [CCRC-POL-04 Code of Conduct for Commissioners and INEDs](#).

7 Social Media

- 7.1 Social media is a public forum and the same considerations, including the provisions of this Code, apply as would to speaking in public or writing something for publication, either officially or in a personal capacity. When engaging with social media you must at all times respect confidentiality, financial, legal and personal information.
- 7.2 Where any personal social media accounts used by you make reference or link to your role at the CCRC, you must take care to ensure that it is clear in what capacity you are acting.

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8 Raising Concerns About Improper Conduct

8.1 If you believe that you are being required to act in a way which:

- a) is illegal, improper, or unethical
- b) is in breach of a professional code
- c) may involve possible maladministration, fraud, or misuse of public funds
- d) is otherwise inconsistent with this Code

you must either raise the matter, in the first instance, with your manager, Senior Leadership Team, the Chief Executive, the Chairman or with the CCRC's INEDs as appropriate (see [HR-POL-06 Whistleblowing Policy](#) for further information).

8.2 In certain circumstances, solicitor and barrister employees may be under a professional obligation to report to their respective professional bodies, misconduct by other solicitors or barristers. The CCRC will not interfere with these professional obligations. However, in keeping with the CCRC's policies, no employee (whether or not they are a lawyer) may release any case papers or material without the CCRC's express consent.

Definitions

Key Word	Meaning
Board	The group providing governance of the CCRC, comprising: <ul style="list-style-type: none">• Chairman (a Commissioner)• Commissioners (x3)• Independent Non-Executive Directors (x3)• Chief Executive (SLT)• Casework Operations Director (SLT)• Finance and Corporate Services Director (SLT)

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Commission	CCRC
Commissioner	Casework decision-maker appointed by the Monarch
Employee	Used interchangeably with 'staff' (see below)
INED	Independent Non-Executive Director
Personnel	The collective term for Staff, Commissioners, and INEDs
SLT	Senior Leadership Team, comprising: <ul style="list-style-type: none"> • Chief Executive • Casework Operations Director • Finance and Corporate Services Director • Head of Communications and External Affairs • Head of Business Planning and Performance • Head of Human Resources, and • In-House Counsel
Staff	Employees on permanent and fixed-term contracts, and secondments.
WLT	Wider Leadership Team, comprising all other managers not otherwise defined as the SLT.

Appendices

None

Relevant CCRC Documents

Q-POL-01	CCRC Quality Policy
CCRC-POL-04	Code of Conduct for Commissioners and INEDs
CW-CGN-09	Conflicts of Interest in Casework
CW-POL-19	Disclosure by the CCRC
FIN-POL-01	Travel and Subsistence Expenses Policy
FIN-POL-02	Non-Travel Expenses Policy
HR-POL-06	Whistleblowing Policy
HSF-POL-05	Handling Government Classified Information Policy
HR-POL-08	Gifts & hospitality Policy
HR-F-08	Gifts and Hospitality Declaration Form
HR-POL-22	Declaration of Financial and other Interests Policy
HR-F-14	Declaration of Financial and other Interest form

Legal Documents (available for free from www.legislation.gov.uk)
Criminal Appeal Act 1995

Document Control

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Issue authorised by: Karen Kneller (Chief Executive)

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Version History

Date Issued	Version	Brief Details of Change	DCR
31/01/2025	1.0	First Issue	24/99

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