

Code of conduct

Policy overview

The code of conduct sets out the standards we expect from our employees.

The code is not exhaustive in defining standards of conduct. Employees must behave in a manner in line with our values and must follow our policies, procedures and processes.

If an employee is unsure what the expectations are, they must ask their line manager.

Principles

This code applies to:

- all employees and workers, irrespective of employment status
- all employees in community and voluntary controlled schools, where we are the employer

We may take disciplinary action if employees fail to comply with the code and associated policies.

We will report breaches by those on contracts of service or agency to the temporary staff provider. It may result in the withdrawal of work.

The code is advisory for employees in foundation and voluntary aided schools, where the governing body is the employer.

This code is written in the context of a corporate council employee. School-based employees should interpret this as follows:

- references to county council or us refer to the school
- references to council members refer to the governors
- references to the manager or director refer to the headteacher or, in the case of the headteacher, would refer to the chair of governors

This code of conduct includes the national code of conduct guidelines. It is also based upon the key principles of public life recommended by the Committee on Standards in Public Life (The Nolan Committee).

Honesty, integrity, impartiality and objectivity

These must be the principles for all employees to perform their duties.

Employees have a responsibility for implementing policy, delivery of services and our operational management.

Employees will work with political sensitivity in advising and supporting members. Political views and preferences will not influence employees in carrying out your role.

The public has a right to expect the highest levels of integrity and responsibility of all employees. Employees will work to honour this, at all times.

Political neutrality

Employees are required to serve all councillors whether or not those councillors are part of the controlling group. In their job employees may also be required to advise political groups.

Employees must not:

- be involved in advising any political group
- attend any of their meetings, without the express consent of their manager or director
- compromise their political neutrality

Employees are required to serve the council. Therefore, employees cannot be accountable for individual political groups. Employees must not allow their personal political opinions to interfere with your work.

Employees cannot stand as a county councillor if employed by:

- the county council
- community and voluntary controlled primary, secondary and special schools with delegated budgets

Provided any resultant conflict of interest is declared, school employees are eligible to stand for office as:

- a member of parliament
- a member of a county, district, borough or parish council

There are certain restrictions for politically restricted or sensitive posts. The terms of restriction constitute contractual provisions.

Employees must check with their manager or refer to the policy and procedure on politically restricted posts. This incorporates advice for employees standing for election.

Employees in a position of trust

Employees working with children or vulnerable adults must inform their manager immediately if they are subject to a:

- criminal conviction
- caution
- ban
- police enquiry
- pending prosecution

We may discuss this within the context of the duties of the post held. It is essential in helping to safeguard the safety of children and vulnerable adults. It is a requirement as part of the Disclosure and Barring Service (DBS) process.

Accountability

Employees are accountable to us for their actions. They are required to comply with legislation, terms and conditions of employment, service and other written guidelines.

Equalities

A commitment by all employees to implement equalities in all aspects of their work is fundamental to effective service provision and effective working relationships

All members of the public, customers, suppliers, and other employees have a right to be treated with fairness and equity.

Employees must comply with the law and our policies relating to:

- equalities
- diversity and inclusion
- equal opportunities

Employees are required to read the [diversity and inclusion policy](#). Employees should strive to ensure that they do not discriminate against anybody, whether employee or customer.

We will not tolerate discriminatory behaviour, including harassment. The [disciplinary procedure](#) will be applied and employees may be subject to criminal proceedings.

Health and safety

Employees must adhere to the health and safety at work policy and associated policies.

Employees must not act in a manner liable to place anyone at risk. You must adhere to the duty of care prescribed in the health and safety at work policy.

Standards of dress and appearance

An employee's standard of dress and personal adornment must be appropriate to their work. Inappropriate dress can create the view that we are inefficient or create offence. It can be interpreted as disrespectful by the public.

We value and welcome the diversity of our workforce. We will take account of ethnic and religious dress requirements with sensitivity.

We expect employees to conform to health and safety clothing requirements and to wear any uniform issued.

Safeguarding

Employees need to be aware of the possible abuse of children and vulnerable adults. If an employee has concerns, they must follow the safeguarding policy. If employees work with children and vulnerable adults, they have a responsibility to safeguard and promote their welfare.

For more information read the [adult safeguarding policy](#) or [children's safeguarding policy](#).

Terms and conditions of employment and of service

Employees must read and understand the conditions of employment and conditions of service under which we employ them. This includes all local policies, which take into account all legislation and the local and national schemes. Employees are responsible for ensuring that they comply with the latest versions of these policies and conditions.

Social media

Employees must ensure that they are aware of and follow the advice and guidance about using social media. Details are in the [social media and mobile devices in employment policy](#) and the social media policy. We respect an employee's private life but must ensure that confidentiality and our reputation are protected.

When using social networking websites in your private life, an employee must not:

- promote yourself as working for us in a way which may bring us into disrepute
- identify other county council employees or customers without their consent
- make any defamatory remarks about us, our customers, clients, partner organisations, employees or managers
- conduct yourself in a way that is detrimental to us
- disclose personal data or information or images that could breach data protection legislation about:
 - the council
 - our customers
 - clients
 - partner organisations

- employees or
- managers

Our social media policies apply to:

- all service areas
- when employees are engaged in our business
- an employee's personal use of social media where it could have a negative impact on our reputation

Employees are also required to comply with IT and email policies.

Electronic recording

Unless authorised, employees are not permitted to record meetings by electronic, audio or video devices. Authorisation must be from the appropriate senior manager before any such recording taking place. This includes all meetings associated with disciplinary, grievance, appeals and any other such procedures.

It may be beneficial to record meetings to support with the preparation of notes. The meeting organiser must clarify the need to make the recording with all present at the start of the meeting.

Local and professional requirements

Employees are required to comply with:

- our policies and procedures
- any other specific guidelines issued by your service or director area.

We may refer to these as local working practices or local requirements.

Where you are a member of a professional institute or association, you are obliged to comply with any of their professional code and standards of practice.

Respect for others

Employees must:

- treat others with respect
- not discriminate unlawfully against any person
- treat members and co-opted members professionally

Harassment and bullying

Employees

The working environment is one where all its employees are treated with dignity and respect. The harassment and bullying policy, along with other policies, procedures and guidance deal with this.

We expect employees to act as role models for the organisation. Employees should proactively challenge behaviour and actions that may adversely affect health and wellbeing.

Councillors

Mutual respect between employees and councillors is essential to good local government. Close personal familiarity between an employee and individual councillors can damage the relationship. It can prove embarrassing to other employees and councillors and should be avoided.

If an employee enters into a personal relationship with a councillor, they must declare this to their manager.

The local community and service users

We expect employees to give the highest possible standard of service to the public. Where it is part of their duties, they must provide appropriate advice to councillors and fellow employees with impartiality.

In carrying out duties and responsibilities, an employee's honesty and integrity must be beyond question.

Customer care, politeness and courtesy must be maintained with appropriate professional boundaries. Particular attention must be paid to this when in contact with vulnerable service user groups.

Employees must ensure courteous, efficient and impartial service to all groups and individuals. Behaviour which is disrespectful, antagonistic and aggressive is not acceptable.

We do not expect employees to tolerate behaviour from customers, clients or the public that is disrespectful, antagonistic and aggressive. Report this immediately if this occurs. An employee's service or director area may have its own customer care policy in addition to these guidelines. Refer to the corporate customer service policy.

We expect employees to be ready and able at the agreed times to carry out their job, as per the constitution.

Contractors

All relationships of a business or private nature with our external or potential contractors must be made known to the appropriate manager in the director or service area.

We must award orders and contracts on merit in fair competition with other tenders. We must not discriminate against or show special favours to any part of the local community.

Financial

An employee must advise their manager or director in writing if they find they have a financial or other interest in a contract which has or could be entered into by us.

Stewardship

An employee must:

- use any public funds entrusted to or handled by them responsibly and lawfully
- not make personal use of our property or facilities unless properly authorised to do so

Financial management

We acknowledge the responsibility we have for the administration of:

- our own funds
- public funds
- funds under the control of employees

We emphasise both to the public and employees the importance we place upon probity, financial control and honest administration. We will keep our arrangements for the prevention and detection of fraud and corruption under constant review. We will pursue all suspected irregularities and take appropriate action.

Where an employee has direct responsibility for financial transactions, they must comply with our financial regulations. For example, when ordering goods and services on our behalf.

If we find that an employee has committed any act of fraud or theft, we will regard this as gross misconduct. They may face dismissal. We may involve the police to decide whether to instigate a criminal investigation.

Patent

Employees must disclose to their manager any matter, item or idea capable of being patented. This applies whether developed or discovered by the employee, alone or with colleagues, in the course of their duties. Subject to provisions of the Patents Act it will belong to us.

We will decide whether to apply for a patent or other protection in law for any invention, which belongs to us under the Patents Act.

Copyright

All records, documents and other papers which are compiled or acquired by an employee relating to finance and administration in the course of their employment are and will remain our property. The copyright in all such cases belongs exclusively to us.

In the case of academic work, such as projects undertaken as part of a course to further an employee's professional career, the copyright will belong to the employee. This includes books, contributions to books, articles and conference papers.

Care and use of our resources

Employees must treat all our equipment with due care and respect.

They may not use our resources for anything other than for the proper advancement of our business. This includes materials, equipment and cash, or business information such as trade secrets. If an employee wishes to use our equipment for other business, they must have permission from their manager in advance.

Security and use of computer data or equipment

Employees must adequately secure data and systems against risks such as:

- operator errors
- theft of equipment
- unauthorised access to or copying of programmes
- use of unauthorised software on our machines, and
- natural hazards such as fire, flood and power failures

Employees must comply with relevant data protection legislation at all times. Employees must adhere to information assurance policies and guidelines.

Employees must ensure that no unauthorised person gains access to equipment or data under their control. No data should be released unless approved and conforms with data protection legislation. Employees must not disclose user IDs and passwords to anyone. Passwords must be changed regularly to a previously unused password.

Email

Misuse and time-wasting on email are unacceptable. Personal messages must be kept to a minimum. Employees must not use email to undertake personal business for monetary gain.

We do not condone the sending of defamatory email messages. If an employee does this, they will be subject to our disciplinary policy.

The tone and content of all messages must be appropriate and consistent with our communication guidelines. The email policy within the corporate information security policy has further guidance.

Personal use of the internet, including social media, is permitted provided that you comply with:

- internet and intranet policy contained in the corporate information security policy
- social media policy
- [social media and mobile devices in employment policy](#)

You use must not:

- impact upon an employee's work
- interfere with the performance of an employee's work

- interfere with other employees doing their work

There will be no access to sites which have a terrorist, offensive, sexual or game playing or gambling content. We monitor access to the internet regularly. Anyone found accessing or attempting to access such sites will be subject to disciplinary proceedings.

Personal interests

In their official or personal capacity, employees must not:

- allow personal interests to conflict with our requirements
- misuse their position to confer an advantage or disadvantage on any person

Employees are required to declare an interest if you have a connection or potential connection with any business or organisation which deals with us. This includes voluntary bodies.

An employee's life away from work is their personal concern. An employee must not subordinate their work to their private interests.

An employee should not put themselves in a position where their job, or our interests and their own personal interests conflict. This includes behaviour that could undermine our confidence or trust in the employee. For example, facing criminal charges.

Employees must notify their manager or director without delay of any criminal investigation, charge or caution. This does not include minor driving offences if their job does not include the use of a car.

These rules apply for charges incurred within or outside the course of your employment.

Additional employment

We will not prevent an employee from undertaking additional employment providing it does not:

- conflict with the interests of, or in any way weaken public confidence in us
- in any way affect the performance of their duties and responsibilities whilst at work or
- where their current position could confer an advantage to their private interest or personal gain

If there is a conflict, the employee's manager can ask them to discontinue conflicting private business interests.

Employees are required to obtain prior consent from their manager if they wish to take up any additional employment. This is important if they:-

- may exceed an average of 48 hours work per week, or

- which could have a detrimental effect on the employee's health and safety

We will not unreasonably withhold this consent.

Alcohol and drugs

The prevention of alcohol and drug misuse policy aims to ensure that employees report fit for work and to perform their duties.

The consumption of alcohol is not permitted on our premises unless specifically approved by a senior manager. We prohibit the use, possession, distribution or sale of drugs at the workplace, or when conducting our business.

If an employee has an alcohol or drug dependency problem, we will consider it as a treatable illness. Managers will provide assistance and support wherever possible. The employee support and counselling service is also available.

If an employee refuses help or drops out of a treatment programme, whilst this may not be automatic grounds for dismissal, it may affect the level of support we provide.

Any behaviour or performance concerns after that will be subject to appropriate action.

Conflicts of interest, gifts and hospitality

Registration of interests

An employee must register any interest they, their spouse or partner have which may conflict with ours. This includes any employment, substantial shareholding or membership of any external company or voluntary organisation which:

- has or may enter into a contract with us
- is involved in campaigning or lobbying about our activities

To register an interest, use the officer interests registration form on the Democratic Services Hub on Sharepoint.

The manager will pass that information to the democratic services manager who will enter it in a register of interests held for that purpose.

Suppose an employee lets contracts, or are involved in any way in engaging or supervising contractors. In that case, they must inform their manager immediately if either they or a relative or friend has any personal interest in respect of the contractor or potential contractor. That interest may be through:

- employment

- substantial shareholding
- membership of the contracting company or body

The manager will take steps to address any potential problems arising from the conflict of interests. For example, another employee may carry out the tendering process or deal with the contractor or potential contractor.

A 'significant interest' in a company is one where the employee, a relative or members of the same household in total have more than a 20% shareholding in a company. However, it may be that a shareholding below 20% is 'significant' for example, where the individual has veto rights or exercises control/influence over the company in other ways. If in doubt, the employee must seek further clarification from their manager.

A 'relative' means a spouse, partner, civil partner, parent, parent-in-law, son, daughter, step-son, step-daughter, child of a partner, brother, sister, grandparent, grandchild, uncle, aunt, nephew, niece, cousin, or the spouse or partner of any of the preceding persons. Partner means a member of a couple who live together.

A 'friend' is someone well known to another and regarded with liking, affection and loyalty by that person. A closer relationship is implied here rather than mere acquaintance.

The requirement to enter an interest on to a register relates only to the employee's interests, or those of their spouse or partner. The need to declare an interest during the course of employment is much broader. It relates both to the employee's interests and those of their friends or relatives. An employee can only make a declaration of interest they know about. The requirement does not imply any obligation to make enquiries of friends and relatives as to the interests they hold.

An employee is required to declare an interest if it comes to their attention that they have a connection or potential connection with any business or organisation (including voluntary bodies) which deal with us.

The same principles apply to work carried out through partnerships. Care is needed to ensure that employees identify, declare and address potential conflicts of interest appropriately.

If in doubt, the employee must register and declare an interest.

Gifts and hospitality

Employees should refuse personal gifts and hospitality offered to them or members of their family subject to the following:

- gifts and hospitality of 'token value' may be acceptable. For example, a pen, small gift, diary or a modest lunch, provided it is not a regular practice
- where the acceptance of refreshments or a meal would be appropriate in the conduct of regular business

Employees must treat with extreme caution any offer of a gift, favour or hospitality that is made to them personally. The person or organisation making the offer may be doing or seeking to do business with us or

maybe applying to us for planning permission or some other kind of decision.

Employees must not compromise their position as a public service worker by accepting gifts or hospitality. Employees might be, or might be thought by others, to have been influenced in making an important decision as a consequence.

Gifts

When deciding whether or not to accept an offer of a gift, the context is vital. It is unlikely that an offer from a company seeking to do business with us made to anyone involved in letting a contract will be acceptable. This is regardless of the value of the gift. Employees must never accept monetary gifts of any kind, whether in the form of cash, or cheques, vouchers or coupons.

Hospitality

Examples of hospitality which can be accepted are:

- refreshments or a meal given during or after business
- invitation to a society or institute dinner

Examples of hospitality which are not acceptable are:

- a holiday or business trip paid for by business contacts
- use of a company flat or hotel suite

Employees should decline offers from companies of promotional sales. Employees must inform their manager who will then decide whether to notify the Section 151 officer. They can write to the company concerned, indicating that improved discounts are the only form of promotion acceptable to us.

Employees must not use their own, relatives' or friends' loyalty cards when making purchases on behalf of us or service users.

Sometimes we sponsor or give grants for sporting and cultural events such as exhibitions and plays. Employees, their partner, spouse or relative shall not receive any benefit from such sponsorship or grant in a direct way without fully disclosing to their manager.

Where we give support in the community, employees must ensure that they provide impartial advice. For example, through sponsorship, grant aid, financial or other means. There must be no conflict of interest.

Registration of gifts and hospitality

Employees must record all offers of gifts or hospitality, whether or not they are accepted.

There is no requirement to record receipt of promotional material of token value.

Sometimes the reasons for acceptance of a gift or hospitality cannot be expressed in a simple form of words. The reasons should be recorded separately and cross-referenced to the register.

- Employees must always record the reason for accepting any gift worth over £50. A manager may agree to accept the gift on the basis that a group of employees shares it. Where appropriate, it can be used as a raffle prize or for a fund-raising event to benefit service users. A series of gifts which altogether total more than £50 in value must be registered.
- Employees must take care if purchasing goods or services on behalf of us. If there is an offer of a gift or hospitality, they must record it using the officer interests registration form. This applies whether or not it is to be accepted. Where it is to be accepted, approval should be obtained, from their manager.
- Employees must refuse to accept the legacy or bequest from service users' Will regardless of its value if it is as a consequence of their employment. Employees must also report the legacy or bequest to their manager.
- Any prizes won whilst on our business or while using our funds must be reported immediately to the manager. They will decide on the acceptability of such a prize.
- Where an external organisation wishes to sponsor a county council activity, the rules concerning the acceptance of gifts or hospitality apply. This can be by invitation, tender negotiation or voluntarily.
- Employees should treat all offers of free hotel accommodation or tickets for concerts or sporting events with caution. These are usually of a value more than £50, and you must seek approval to accept such hospitality.

If there is any doubt, employees must decline any offer of hospitality. Also, employees must enter any prizes won by them at a hospitality event in the register as a separate item.

If an employee is concerned about a particular gift or offer of hospitality, they must obtain advice from their manager.

Reporting procedures

An employee must not treat another county council employee less favourably than other employees.

It is a breach of an employee's terms and conditions of employment and our policies if they victimise another employee who has used our reporting procedures to report the misconduct of others.

The whistleblowing policy (confidential reporting code) intends to encourage and enable anybody who works for or on behalf of us to raise serious concerns and to make it clear that reporting can happen without fear of reprisal.

The Public Interest Disclosure Act 1998 (PIDA) and the Enterprise and Regulatory Reform Act 2013 protect employees who raise any concerns.

Fraud

Fraud is a deliberate deception to gain a personal advantage. The effects of fraud or corrupt activities can have a severe negative impact on everyone. These actions have no place within an ethical organisation.

Fraud includes:

- deception
- bribery
- forgery
- extortion
- corruption
- theft
- conspiracy
- embezzlement
- misappropriation
- false representation
- concealment of material facts
- collusion

The anti-fraud policy aims to deter, detect and take action against any attempted fraud or corrupt acts.

An employee must not undertake or assist in fraud, whether intentional or not.

Breach of this policy could result in disciplinary action and criminal prosecution.

Openness

Without consent or unless required by law, an employee must not:

- disclose information given to them in confidence by anyone
- disclose information acquired which they believe is confidential
 - without the consent of a person authorised to give it
 - unless they are required by law to do so
- prevent another person from gaining access to information to which that person is entitled by law

Use of information and confidentiality

Employees are required to understand and comply with information governance requirements.

An employee may work in areas other than their normal office or in premises shared with employees working in other services. If they view, overhear or otherwise come into contact with confidential information, they must maintain the privacy of this at all times. An exception can be if you are expressly authorised to divulge it, or are required to do so by law for example to:

- members
- auditors
- government departments

- service users
- the public

Employees must use their discretion on where to hold conversations of a confidential nature. Refer to the information governance guidance document and be vigilant with information.

Employees have a duty of confidentiality, no matter what their function or capacity within the county council is.

Information governance is the framework of law and best practice. It regulates how we manage information.

Information concerning an employee's private affairs will not be supplied to any person outside the county council without their consent. This applies to anyone within the county council unless that person has authority or responsibility for such information.

Employees must never use their authority or position for personal gain. Employees must not enable colleagues or others to gain personally.

Employees must not divulge any information received from a councillor which is personal to that councillor and does not belong to us. Exceptions are if the employee has the prior consent of the councillor or where the law requires disclosure.

Identity cards

Employees must have your identity (ID) card with you at all times. If an appropriate person, for example another employee or the commissionaire, challenges an employee, they must show their ID card.

Media contacts

Employees are not permitted to make statements to the media or any other public statement which concerns our business unless they are:

- authorised by their manager to act generally as a spokesperson
- expressly authorised to act as a spokesperson for a particular situation
- acting as an authorised trade union spokesperson

Employees are not permitted to make statements concerning the position of an employee.

If there is a media or press enquiry or other requests for a statement regarding an employee's position, they will be advised of this enquiry immediately by their line manager.

Employees must advise the communications and engagement team of the enquiry. We recommend that employees use the following statement:

"We are unable to comment on any matters that relate to individual members of staff."

If there are any other approaches from the media, the relevant director and the head of HR, will discuss and agree on any future statements with the communication and engagement team. They will notify our executive team as appropriate.

Personal relationships

Employees must not be involved in the appointment or any other decision relating to the discipline, promotion, pay or conditions of another employee, or prospective employee, who is a relative, partner or friend.

- 'Relative' means a spouse, civil partner, partner, parent, parent-in-law, son, daughter, step-son, step-daughter, child of a partner, brother, sister, grandparent, grandchild, uncle, aunt, nephew, niece, or the spouse or partner of any of the preceding persons
- 'Partner' means a member of a couple who live together.

We recognise that employees who work together may form personal relationships, or maybe related to one another. We do not wish to interfere with these personal relationships. However, it is necessary to ensure that employees behave appropriately and professionally at work.

The following principles apply to all employees regardless of their job or level of seniority:

- if an employee is involved in a personal relationship with a colleague, contractor, client, customer or supplier, they must not allow that relationship to influence conduct whilst at work. Intimate behaviour during work time is expressly prohibited. This rule applies during all working time, whether at the normal workplace or elsewhere on county council business
- Managers and supervisors must declare any relationship with an employee whom they supervise, to a senior manager. To avoid a situation where an employee has managerial authority over another with whom they are in a personal relationship with or are related, we may:
 - elect to transfer one or both of the employees involved to a job in another team or service area, or
 - transfer the employees' reporting lines to other managers.

In these circumstances, we will consult with the employees. We will seek to reach an agreement regarding the transfer of one or both of them.

- If an employee embarks on a personal relationship with or is related to a colleague working in the same service area they must declare this to their manager. This is in the interests of openness and transparency.
- If an employee begins a personal relationship with, or are related to, a client, customer, contractor or supplier which their job requires them to have authority over they must declare this to their manager. For example, if the employee has the authority to decide to whom to award contracts. We reserve the right to transfer or to alter the responsibilities of, the employee's role following consultation.
- If an employee is involved in appointments, they must make those appointments only based on merit. To avoid an accusation of bias, they must not be involved in an appointment where they are related to or have a personal

relationship with an applicant.

- An employee must not be involved in decisions relating to discipline, promotion, recruitment or pay and conditions for any employee who is a relative, partner, or whom they have a personal relationship with.

Duty of trust

Employees must, at all times, act with the faith that the public is entitled to place in you. [Read Part V of our Constitution](#), which applies to all employees. It requires employees to be ready and able at the agreed times of working to carry out their job.

Employees must express politeness and courtesy to the public and internal and external clients at all times. They must maintain customer care and courtesy with appropriate professional boundaries. They must pay particular attention when in contact with vulnerable service user groups.

In carrying out their duties and responsibilities, employees' honesty and integrity must be beyond question.

Conduct outside of work

Employees must not engage in conduct outside of work which could damage:

- our reputation and standing
- an employee's reputation
- the reputation of other members of the county council or councillors.

Misconduct or criminal offences, which could bring the employee or us into disrepute, may be subject to disciplinary action.

Compliance with the code of conduct

Failure to comply

Failure to comply with any of the provisions included in the code of conduct may result in disciplinary action being taken under the [disciplinary policy and procedure](#).

Failure to comply by a relief or casual, agency or freelance worker or contractor, may result in no further work being offered to the individual.

We reserve the right to take legal action against employees where breaches of the code warrant such action.

Employee declaration

Employees must keep their manager informed of any change of circumstance which requires their declaration to be updated. Declarations must be made in writing using the appropriate form, and we will

hold copies on their file.

We will undertake periodic reviews and employees must respond to these accurately. We hold all employee declarations with the appropriate levels of confidentiality.

Employees must complete and return the employee declaration and officer interests form.

Agency and freelance workers or contractors are required to complete the requisite form provided to them.

