

**CODE OF CONDUCT**  
**Old Oak and Park Royal Development Corporation**

**1. Introduction and interpretation**

(1) This Code applies to you as a member of the Old Oak and Park Royal Development Corporation (the Corporation) and to your work in connection with the Board or any Committee or Sub-Committee and its business.

(2) It is your responsibility to comply with the provisions of this Code, including as amended from time to time.

(3) In this Code—

(a) “Corporation” means the Old Oak and Park Royal Development Corporation;

(b) “business or work of the Corporation” (and cognate expressions) includes any meeting or other activity performed by you in connection with the work of the Corporation in relation to it, including with other Board Members and/or Officers.

(c) “Member” means a member of the Board, Committee or Sub-Committee of the Board “;

(d) “the Board, Committee or Sub Committee” means the Board of the Old Oak and Park Royal Development Corporation or Committee or Sub Committee of the Board

**2. Standards in public life**

As a person covered by this Code you must observe the seven principles of public life (‘the Nolan Principles’) set out below in your work on the Board, Committee or Sub Committee:

(1) **Selflessness** - You should act solely in terms of the public interest. You should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

(2) **Integrity** - You should not place yourself under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

(3) **Objectivity** - In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, you should make choices on merit.

(4) **Accountability** - You are accountable for your decisions and actions to the public and must submit yourself to whatever scrutiny is appropriate to your office.

(5) **Openness** - You should be as open as possible about all the decisions and actions that you take. You should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

(6) **Honesty** - You have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

(7) **Leadership** - You should promote and support these principles by leadership and example.

### 3. Interests

(1) It is recognised that Board, Committee or Sub Committee members will also have strategic decision making positions in other organisations whose activities relate to the Board's work. This is welcomed as it helps provide valuable links and intelligence for the Board and the Corporation. However, issues may potentially arise regarding transparency in decision making, in particular where Board, Committee or Sub Committee members have already been involved in making decisions within other organisations on topics which are being considered by the Corporation. Therefore, it is important that Board and Committee Members – when acting in their capacity as OPDC Members – comply with the following requirements.

#### *Declaration of interests*

(2) As a Board, Committee or Sub-Committee member, you are required to:

- Register (using the prescribed form) and declare (at relevant meetings) interests in accordance with the statutory Disclosable Pecuniary Interests regime; and
- Act in accordance with the Principles of Public Life, including in particular the need to be open about any non-pecuniary interests that you or your partner holds that are relevant to the work of the Corporation. For these purposes, the nature of an interest would be one that, if a member of the public knew the relevant facts, he/she would regard it as being so significant that its existence was likely to prejudice your judgement of the public interest when undertaking the work of the Board.

(3) You must provide a completed Declaration of Interests to the Corporation's Chief Executive Officer within 28 days of becoming a Member, and thereafter within 28 days of you becoming aware of any new personal interest or change to any personal interest.

#### *Action where a conflict of interest arises*

(4) If you have a pecuniary interest - and a resulting conflict of interest - in the Board's work (as above) you must:

- (a) declare the existence and nature of the pecuniary interest to the Corporation's Chief Executive Officer as soon as possible, and provide the relevant details in writing if you have not already done so in the Standing Declaration of Interests referred to at paragraph (2) above;
- (b) seek the Corporation's Chief Executive Officer's advice as to any consequences for your work on the Board and any action you should take to remove any conflict;
- (c) not participate in the Board's work or that part of its work (including meetings, where you should leave the room) where the conflict or potential conflict arises; and
- (d) not seek to influence any other Board, Committee or Sub Committee Member, Officer of the Corporation or other relevant person in relation to it.

#### **4. Gifts and hospitality**

(1) As a Member of the Board you are required to register any gifts or hospitality worth £25 or over that you receive in connection with your role on the Board. However you must at all times be, and be seen to be, fair, impartial and unbiased. As such:

- Gifts and hospitality should not be, or seen to be, part of usual business; any acceptance should be infrequent.
- Within 28 days of receiving gift(s) and/or hospitality in connection with your official duties with a value of £25 or more, you must register those items with the Monitoring Officer including providing details of the source of the gift or hospitality and your reason for accepting it.

#### *Acceptance of gifts and hospitality*

(2) For the purpose of this Code, gifts are defined as including (but are not limited to):

- (a) The free gift of any goods or services (including tickets or invitations to events etc).
- (b) The opportunity to acquire any goods or services at a discount or at terms not available to the general public.
- (c) The opportunity to obtain goods or services not available to the general public.

(3) Hospitality is taken to refer to the offer of food, drink, accommodation or entertainment, (except that which is provided by the Corporation) or the opportunity to attend any cultural, business or sporting event. Common hospitality includes lunches or dinners provided by external bodies or tickets to events.

#### **5. Other benefits and favours**

Be cautious when purchasing anything, or when additional services, privileges, discounts or advantages are offered, which might be related to your position at the Old Oak and Park Royal Development Corporation. This might include the opportunity to acquire any goods or services at a discount or at terms not available to the general public. This does not include discounts which may have been negotiated by the Corporation on behalf of all staff, for example discounted membership fees at a fitness centre.

#### **6. Principles to Apply in Relation to Gifts and Hospitality**

In deciding whether it is appropriate to accept any gift or hospitality you must apply the following principles:

- Do not accept a gift or hospitality as an inducement or reward for anything you do at the Old Oak and Park Royal Development Corporation. If you have any suspicion that the motive behind the gift or hospitality is an inducement or reward you must decline it;
- Do not accept a gift or hospitality of significant value or whose value is excessive in the circumstances; do not accept a gift or hospitality if you believe it will put you under any obligation to the provider as a consequence; do not solicit any gift or hospitality and avoid giving any perception of so doing.
- You must be clear as to the value of the gift / hospitality at the time that you agree to accept it; where the actual value of a gift or hospitality is not known or is not reasonably obtainable, you must decide how much a person could reasonably be expected to pay for it at a commercial rate;

- For staff, offers of hospitality should be accepted only with the prior approval of your Director; prior approval by the relevant Director of gifts should also be sought by staff where it is possible to do so;
- You should declare receipt of any gift or hospitality that an ordinary member of the public might reasonably deem to be significant (eg the identity of the provider or the wider context in which the item was provided), regardless of its formal cash value;
- Do not accept a gift or hospitality: from parties involved with the Authority in a competitive tendering or other procurement process; from applicants for planning permission and other applications for licences, consents and approvals; from applicants for grants, including voluntary bodies and other organisations applying for public funding; from applicants for benefits, claims and dispensations; or from parties in legal proceedings with the Authority.

## **7. Items that do not need to be declared**

- As a general rule, you will not need to declare:
- Gifts and hospitality that is wholly and clearly unrelated to your position at the Corporation;
- The acceptance of facilities or hospitality provided to you by the Corporation and/or working meals including meals taken in the course of attending (following approval, for members of staff) meetings or conferences or training courses where they are provided to all attendees as part of the event;
- Attendance at formal functions as a representative of the Corporation and attendance at formal social functions in relation to which invitations have been issued to all members of staff; or
- Attendance at information gathering or sharing events with public or charitable / think tank bodies, such as meetings with representatives of the Old Oak and Park Royal Development Corporation, , local authorities and Government departments / agencies, other public sector organisations.

You are not required to declare gifts and/or hospitality that have been offered but declined. However, you should report to the Chief Executive Officer) any offers you have declined that could be perceived as significant or controversial. The key criteria would be whether the offer was novel (ie unusual) and frequency/persistence of the offer. Such offers would not be published on the gifts and hospitality register; reporting of any such offers would, however, allow action to be taken corporately and/or further guidance to be given where necessary.

## **8. Making a declaration**

- You must declare any gift or hospitality of £25 or over that you receive in connection with your official duties with the Corporation, the source of the gift or hospitality, and your reason for accepting it;
- You must register the form/declaration with the Chief Executive Officer within 28 days of receiving it; and
- You must include within the form/declaration the actual value of the gift or hospitality or its value estimated in accordance with this guidance.

*Registration of gifts and hospitality*

- (1) The receipt of a gift, benefit or hospitality must be registered with the Corporation within 28 days of the date of receipt.
- (2) A summary list of all gifts and hospitality declared by Members of the Board, Committee or Sub Committee will be published on the Corporation's website.

This Code may be amended from time to time by the Mayor of London.