

Code of Conduct for Members

Date of approval (v2.1)	<ul style="list-style-type: none">• Approved by Board on 10 July 2025,• Recommendation brought to the Audit and Risk Committee, 9 June 2025• Approved by SMT, May 2025• Approved by Head of Governance, 20 May 2025
Changes from previous version	<ul style="list-style-type: none">• General tidying up.• Updates to the descriptions to the seven principles of public life have been updated.• A definition of bullying conduct has been inserted using the Advisory, Conciliation and Arbitration Service wording.• Direction to definition of interest added.
Review date	September 2027
Senior owner	Chief Executive Officer
Document owner	Head of Governance

Contents

1.	Introduction and interpretation	3
2.	Standards in public life	3
3.	Interests	5
4.	Gifts and hospitality	7

1. Introduction and interpretation

1.1 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, its business and work generally.

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

1.3 The terms used in this Code are:

- “Corporation” means the Old Oak and Park Royal Development Corporation
- “the Board, Committee or Sub-Committee” means the Board of the Corporation and/or its Committee or Sub Committees (as relevant), and “meeting” refers to a meeting of those bodies
- “Member” means a Member of the Board, a Committee or Sub-Committee
- “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 or in relation to it, including with other Members and/or Corporation Officers
- “Group Declaration of Interests Form” means the prescribed GLA Group Register of Interests - Notification of Disclosable Interests Form as approved from time to time for use by the GLA Group
- “Disclosable Pecuniary Interest” means anything that is required to be disclosed and registered under paragraphs 1 to 10 of the Group Declaration of Interests Form (including in relation to a Partner as indicated by that Form)
- “Partner” means (as applicable) your spouse, civil partner, or a person with whom you live as if you were a married couple or civil partners
- “Significant Disclosable Interest” means something which, if a member of the public knew the relevant facts, they would regard it as being so significant that its existence was likely to prejudice your judgement of the public interest when undertaking the business or work of the Corporation, its Board, Committees or Sub-Committees (covered by paragraph 11 of the Group Declaration of Interests Form)

1.4 This Code may be amended from time to time by the Board following consultation with the Mayor of London. Minor typographical changes may be approved by OPDC’s Head of Governance.

2. Standards of behaviour

2.1 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:

- **Selflessness** – You should act solely in terms of the public interest.

- **Integrity** – You should avoid placing yourself under any obligation to people or organisations that might try inappropriately to influence you in your work. You should not act or take decision in order to gain financial or other material benefits for yourself, your family, or your friends. You must declare and resolve any interests.
- **Objectivity** – In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, you should make choices impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- **Accountability** – You are accountable for your decisions and actions to the public and must submit yourself to whatever scrutiny is appropriate to your office.
- **Openness** – You should act and take decisions in an open and transparent manner. You should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
- **Honesty** – You should be truthful.
- **Leadership** – You should exhibit these principles in your own behaviour. Actively promote and support the principles and be willing to challenge poor behaviour wherever it occurs.

3. General obligations

3.1 You must treat other with respect. OPDC has a zero-tolerance approach to all forms of bullying, harassment and victimisation. You must not:

- a. do anything which may cause you or the Corporation to breach the Equality Act 2010 or the Bribery Act 2010
- b. bully, victimise or harass any person (including by harassment of a sexual nature)
- c. do anything which compromises or is likely to compromise the impartiality of those who work for, or on behalf of, the Corporation

3.2 In relation to section 3.1 (b) above:

- a. The Advisory, Conciliation and Arbitration Service (ACAS) characterises bullying as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, or cause physical or emotional harm to the recipient. Bullying might be a regular pattern of behaviour or a one-off incident, happen face-to-face, on social media, in emails or phone calls, happen in the workplace or at work social events and may not always be obvious or noticed by others.

- b. Harassment is behaviour that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.¹
- c. Sexual harassment is unwanted conduct of a sexual nature; and
- d. Conduct can be considered sexual harassment even if it was unintentional or not intentionally directed at any specific person.²

3.3 You must not conduct yourself in a manner which could reasonably be regarded as bringing the Corporation into disrepute:

- a. You must not use or attempt to use your position as a Member improperly to confer on or secure for yourself or any other person, an advantage or disadvantage; and

3.4 When reaching decisions on any matter you must have regard to any relevant advice provided to you by the Chief Executive Officer and/or the Chief Finance Officer, where that officer is acting pursuant to their statutory duties.

3.5 Further, you must treat others with respect and act in a way that is inclusive and promotes and supports individuals' dignity, whatever their background.

3.6 You should also, through your actions as a Member, champion and support the Corporation to take equitable actions that proactively address inequalities, barriers and discrimination. Linked to this, you should support the Corporation in realising the benefits of London's diversity by promoting the diverse needs and aspirations of its communities – with reference to the Mayor's strategy for equality, diversity and inclusion (as updated from time to time) and relevant policies and strategies approved by the Corporation.

4. Interests

4.1 Definitions and additional guidance, examples on Pecuniary Interest and other registrable interests can be found in the Group Register of Interests found on the OPDC SharePoint.

4.2 It is recognised that 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 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 Members – when acting in their capacity as *OPDC Members* – comply with the following requirements.

¹ Harassment' is behaviour that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them; 'sexual harassment' is unwanted conduct of a sexual nature. Conduct can be considered sexual harassment even if it was unintentional or not intentionally directed at any specific

² As defined by ACAS, 'What sexual harassment is: Sexual harassment – ACAS'

Declaration of interests

4.3 As a Board, Committee or Sub-Committee member, you are required in accordance with this Code to:

- register, using the Group Declaration of Interests Form
- declare at relevant meetings
- act in accordance with the Principles of Public Life, including in particular the need to be open about any personal interests, any Disclosable Pecuniary Interests or any (non-pecuniary) Significant Disclosable Interests that you or your Partner (as relevant) holds which are relevant to the business or work of the Corporation

4.4 You must, within 28 days of becoming aware of any new disclosable pecuniary interest or other registrable interest or any change to any disclosable pecuniary interest or other registered interest notified to the Chief Executive Officer in writing of that new disclosable pecuniary interest or other registrable interest or change. You should also recertify and resubmit this Form annually, which is communicated to Board from the governance team.

Action where an actual or potential conflict of interest arises

4.5 If you attend a meeting and have and are aware that you have a disclosable pecuniary interest in any matter to be considered, or being considered, at that meeting – you must disclose that interest to the meeting, and may not:

- i. Participate, or participate further, in any discussion of that matter at the meeting; or
- ii. Participate in any vote, or further vote, taken on the matter at the meeting.

4.6 Subject to the Corporation's Standing Orders, you may or may not be excluded from a meeting while any discussion or vote that takes place that you are not permitted to participate in, as a result of 4.4.

4.7 If you attend a meeting and have and are aware that you have an registrable interest in any matter to be considered, or being considered, at that meeting, you must disclose that interest to the meeting.

4.8 In addition to disclosable pecuniary interests and other registrable interests it is important that "relationships" are disclosed if you attend a meeting, and it is relevant to any matter to be considered or decision to be taken to avoid the perception of undue/improper influence. A "relationship" is something which would reasonably be perceived as affecting your conduct or influencing your actions in relation to your role and your actions would give the impression to a reasonable

member of the public with knowledge of all the facts that the “relationship” should be disclosed.³

5. Gifts and hospitality

5.1 As a Member, you are required to comply with the Corporation’s [Gifts and Hospitality Policy and Procedure](#) (as amended from time to time), which forms part of this Code of Conduct.

5.2 You must register any gifts or hospitality that you receive in connection with your role with the Corporation that are above the £50 threshold and within the timescales sets out in the Gifts and Hospitality Policy.

5.3 In accordance with the Nolan Principles:

- you must at all times be, and be seen to be, fair, impartial and unbiased in your involvement in the business or work of the Corporation
- gifts and hospitality should not be, or seen to be, part of usual business; and any acceptance should be infrequent

³ The “relationship” could be a person with whom you are in either regular or irregular contact with over a period of time who is more than an acquaintance. It is someone a reasonable member of the public might think you would be prepared to favour or disadvantage when discussing a matter that affects them. It may be a friend, a colleague, a business associate or someone whom you know through general social contacts. It may also be somebody to whom you are known to show animosity as you might equally be viewed as willing to treat them differently.