

Code of Conduct for Members

Date of approval (v2.1)

- Approved by Board on 13 October 2020 to amend policy to require Members to comply with OPDC Gifts and Hospitality Policy and Procedure.
- Further changes approved in principle by Board on 4 March 2020 to include expanded content on standards of behaviour, and particularly in respect of diversity and inclusion.
- Consent from the GLA Executive Director of Good Growth, on behalf of the Mayor, on 17 November 2020 and again on 30 March 2021.
- Chair's delegated approval on 7 April 2021

Changes from previous version

- General tidying up.
- Removal of majority of gifts and hospitality content and instead pointing to the separate Gifts and Hospitality Policy.
- Minor changes to ensure alignment of content on interests with GLA Group Registration of Interests form.
- Expanded content in respect of diversity and inclusion expectations.

Review date August 2024

Senior owner Chief Executive Officer

Document owner Senior Officer Responsible for Governance

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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 In this Code:

- “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 Senior Officer Responsible for 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. You should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.
- **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.
- **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.
- **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 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.
- **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.
- **Leadership** – You should promote and support these principles by leadership and example.

2.2 OPDC has a zero-tolerance approach to all forms of bullying, harassment and victimisation. You must not:

- do anything which may cause you or the Corporation to breach the Equality Act 2010 or the Bribery Act 2010
- intimidate, bully, victimise or harass any person (including by harassment of a sexual nature)¹
- do anything which compromises or is likely to compromise the impartiality of those who work for, or on behalf of, the Corporation

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

2.4 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.

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 person. 'Bullying' and 'victimisation' are defined in the organisation's Dignity at Work Policy.

3. Interests

3.1 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.

Declaration of interests

3.2 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

3.3 You must provide a completed Group Declaration of Interests Form 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 (i.e. any Disclosable Pecuniary Interest or Significant Disclosable Interests) or change to such an interest. You should also recertify and resubmit this Form annually.

Action where an actual or potential conflict of interest arises

3.4 If you have an actual or potential Disclosable Pecuniary Interest or Significant Disclosable Interest – and a potential resulting conflict of interest arises in the business or work of the Corporation or meeting of the Board, Committee or Sub Committee – you must:

- as soon as possible seek the Corporation's Chief Executive Officer's advice, declare the existence and nature of the interest to them, and provide the relevant details in writing if you have not already done so as an update to the Group Declaration of Interests Form
- seek the Corporation's Chief Executive Officer's advice as to any consequences for your work on the Board, Committee or Sub Committee and any action you should take to remove or mitigate any conflict
- not participate in the Corporation's work or that part of its work (including Board, Committee, Sub Committee or other relevant meetings, where you should leave the room) where the conflict or potential conflict arises

- 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

4.1 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 de facto forms part of this Code of Conduct.

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

4.3 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