

Code of Conduct

1. Introduction and interpretation

- (1) This Code applies to **you** as a Member of London's Local Enterprise Partnership, known as the London Economic Action Partnership (LEAP), and to your work in connection with the Board (or any subordinate body) 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) "Authority" means the Greater London Authority, the Accountable Body for LEAP;
 - (b) "business or work of the Board/subordinate body" includes any meeting or other activity performed by you in connection with the work of the Board/subordinate body and/or the Authority in relation to it, including with other Board/subordinate body members and/or GLA Officers;
 - (c) "Member" means a Member of the Board/subordinate body;
 - (d) "the Board/subordinate body" means the LEAP Board/subordinate body;
 - (f) "Section 127 Officer" is the Chief Finance Officer of the Greater London Authority, as defined by the Greater London Authority Act 1999. The role is broadly analogous to the office held by Section 151 or Section 73 Officers of other authorities. Reference to S151/S73 Officer should be taken to mean the S127 Officer; and
 - (e) "Senior Responsible Owner" is the Executive Director of Development, Enterprise and Environment and lead officer for the LEAP at the Greater London Authority. The Senior Responsible Owner represents LEAP at Chief Executive level.

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/subordinate body:

- (1) **Selflessness** - Holders of public office should act solely in terms of the public interest.
- (2) **Integrity** - Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

- (3) **Objectivity** - Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
- (4) **Accountability** - Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
- (5) **Openness** - Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
- (6) **Honesty** - Holders of public office should be truthful.
- (7) **Leadership** - Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

In addition to the above principles, Members must act in a manner consistent with the [LEAP's diversity statement](#) and treat fellow Members, officers and others they come into contact with when working in their role with respect and courtesy at all times.

Members must not place themselves under a financial or other obligation to outside individuals or organisations that might be reasonably regarded to influence them in the performance of their official duties.

3. Interests

Declaration of interests

- (1) As a Board/subordinate body Member you are expected to notify the LEAP Secretariat of any disclosable pecuniary interests by completing and signing the Register of Interests form and returning it to the LEAP Secretariat at LEAP@london.gov.uk. Guidance on what constitutes an interest is provided at Annex 1 below. The Secretariat will ensure that the Section 127 Officer and Senior Responsible Owner are notified of such declarations.
- (2) With the exception of “sensitive interests” as defined at paragraph 9 below, the London LEP will publish the contents of the Register of Interests form on the lep.london website.

Definition of interests

- (3) You have a disclosable pecuniary interest if it is of a description specified in Annex 1 below and either:
 - (a) it is an interest of yours, or
 - (b) it is an interest of:
 - (i) your spouse or civil partner;
 - (ii) a person with whom you are living as husband and wife, or
 - (iii) a person with whom you are living as if you were civil partners and you are aware that that other person has the interest.

Registration of interests

- (4) You must, within 28 days of:
 - (c) this Code being adopted or applied by the Authority; or

(d) your appointment (where that is later),

notify the LEAP Secretariat in writing of any disclosable pecuniary interests you have at that time, and whether or not you consider that any of these interests should be treated as sensitive interests (as defined in paragraph 9 below).

- (5) You must, within 28 days of becoming aware of any new pecuniary interest or any change to any pecuniary interest already notified to the LEAP Secretariat, notify the LEAP Secretariat in writing of that new pecuniary interest or change, and whether or not you consider that these should be treated as sensitive interests (as defined in paragraph 9 below).

Pecuniary interests in matters considered at meetings

- (6) In this Code, “meeting” means any meeting of the LEAP Board or its subordinate body, or any body to which you are nominated by virtue of your appointment to LEAP.
- (7) If you attend a meeting and are aware that you have a disclosable pecuniary interest in any matter to be considered, or being considered, at that meeting, you must - subject to paragraph 9 below (sensitive interests) - disclose that interest to the meeting, and may not – unless you have obtained a dispensation from the Section 127 Officer – (i) participate, or participate further, in any discussion of the matter at the meeting; or (ii) participate in any vote, or further vote, taken on the matter at the meeting.

Sensitive interests

- (8) Where you consider (and the Section 127 Officer agrees) that the nature of a disclosable pecuniary interest is such that disclosure of the details of the interest could lead to you or a person connected with you being subject to intimidation or violence, it is a “sensitive interest” for the purposes of the Code, and the details of the sensitive interest do not need to be disclosed to a meeting, although the fact that you have a sensitive interest must be disclosed, in accordance with paragraph 8 above.

Other Interests

- (9) The interests regime set out in paragraphs 1 to 8 above are based on statutory requirements for elected members of public office and therefore has the potential to be quite narrow in scope.
- (10) In view of this, and the duty upon all Members to observe the highest standards of ethical conduct in line with the seven ‘Nolan Principles’, Members must exercise their judgement as to whether or not, in view of their outside interests and the interests of others close to them, they should participate in discussions and/or decisions within and by the London LEP.
- (11) To this end, Members should consider how their participation in a discussion or decision would be viewed by the public. If a member of the public, with knowledge of the relevant facts, would reasonably regard a Member’s interest as so significant that it would be likely to prejudice the Member’s judgement of the public interest; the Member should not participate in the relevant discussion or decision.

4. Gifts and hospitality

- (1) As a Member of the Board/subordinate body you are required to register any gifts or hospitality worth **£25** or over that you receive in connection with your role on the Board/subordinate body.

Acceptance of gifts and hospitality

- (2) For the purpose of this Code, gifts and hospitality are defined as:

- (a) the free gift of any goods or services;
- (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;
- (d) the offer of food, drink, accommodation or entertainment, (except that which is provided by the Authority) or the opportunity to attend any cultural or sporting event.

- (3) Under this Code, you are not required to declare:

- (a) gifts and hospitality you receive that are not related to your position as a Member of the Board/subordinate body;
- (b) gifts that are insignificant in nature (e.g. calendars, diaries, office equipment of modest value) having an estimated value below **£25**.
- (c) hospitality that is undoubtedly valued at less than **£25**.
- (d) working meals including meals taken in the course of meetings or training schemes and meals provided by other public sector organisations during fact finding or information sharing events;
- (e) facilities or hospitality provided to you by the Authority;
- (f) facilities or hospitality provided to you by any Member of the Board/subordinate body or any organisations that they represent;
- (g) gifts given to the Authority that you accept formally on the Authority's behalf and are retained by the Authority and not by you personally.; or

- (4) Gifts, benefits and/or hospitality regardless of value should not usually be accepted in any situation where the Authority is potentially entering into a contractual arrangement or is in dispute with the provider. If a decision is taken to accept an offer in such circumstances the receipt should be declared and reasons for it clearly set out.

Registration of gifts and hospitality

- (5) The receipt of a gift, benefit or hospitality must be registered with the LEAP Secretariat within 28 days of the date of receipt.

- (6) A summary list of all gifts and hospitality declared by Members of the Board/subordinate body should be included in the relevant section of each Member's Register of Interests form which will be published on the London LEP website.

This Code may be amended from time to time and the LEAP Secretariat will ensure you are provided with an up to date copy.

Annex 1

Guidance on the Notification of Disclosable Pecuniary Interests

There are seven categories of Disclosable Pecuniary Interests: Employment, Sponsorship, Contracts, Land, Licences, Corporate Tenancies, and Securities. These derive directly from the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012, as do the specifics of what needs to be disclosed under each category.

The *Register of Interests* form identifies what Members need to include under each category, but the following guidance tries to clarify anything that may be unclear. Members are advised that all notifications should come via the LEAP Secretariat who will ensure relevant parties are consulted and advise of any appropriate action.

Employment

You will need to include details of any employment, office, trade profession or vocation carried on for profit or gain by you and or your partner. These details should include the nature and title of the role, and name of any organisation for which the role is performed / which pays you or your partner for performing the role.

Partner means your spouse, civil partner, a person with whom you live as husband or wife, or a person with whom you live as if you were civil partners. This meaning is set out at the first page in the form, and has the same meaning throughout the form.

Sponsorship

Any financial benefit obtained (other than from the LEP) which is paid as a result of carrying out duties as a Member. This includes any payment or financial benefit from a Trade Union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992 (a).

Contracts

The following details need to be entered:

- the names of the parties to the contracts – so the GLA, and either (i) your or your partner's name, or (ii) the name of the firm or body corporate (of which you or your partner is a director, or in the securities of which you or your partner has a beneficial interest);
- the date on which the contract was entered into, and the duration of the contract;
- a brief description of the contract: the goods or services to be provided, or works to be executed

The term "Director" includes a member of the committee of management of an industrial and provident society, and/or a member of a co-operative and community benefit society, and has the same meaning throughout the form.

"Securities" means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society and has the same meaning throughout the form.

Land

The following details need to be entered: what the interest is, whether it is your or your partner's interest, the postcode of the land, and the London borough in which it is situated.

Details of the nature and length of any licence to occupy land owned by the Authority should be entered in this section, along with the postcode of the land, and the London borough in which it is situated.

Details of the nature of, and parties to, any tenancy where the landlord is the Authority should be entered in this section, along with the full address of the property that is subject to the tenancy.

By way of guidance, where:

- you or your partner own or own a percentage of the freehold or long-term leasehold of a property (whether or not subject to a mortgage),
- you or your partner lease land or property, on short-hold tenancies (for example, an assured short-hold tenancy), or
- land or property is owned by a trust in which you or your partner have an interest

these details should be entered in this section of the form.

Securities

Details of the nature of the interest that you or your partner has should be entered in this section, along with the name and full address of the body in whose securities that interest is held.