



Standards of Business Conduct Policy

1.	SUMMARY:	This policy sets out the North Central London Integrated Care Board's Standards of Business Conduct policy.			
2.	RESPONSIBLE OFFICER:	Executive Director of Corporate Affairs.			
3.	ACCOUNTABLE OFFICER:	Chief Executive Officer.			
4.	AUTHOR:	Christopher Hanson, Governance and Risk Lead.			
5.	APPLIES TO:	All ICB members (including committees of the Integrated Care Board), employees, self-employed consultants, contractors, officers and office holders.			
6.	GROUPS/ INDIVIDUALS WHO HAVE OVERSEEN THE DEVELOPMENT OF THIS POLICY:	Ian Porter, Executive Director of Corporate Affairs; Andrew Spicer, Head of Governance and Risk; Kate Harrington-Stillwell, Local Counter Fraud Specialist.			
7.	GROUPS WHICH WERE CONSULTED AND HAVE GIVEN APPROVAL:	This policy was previously approved by the NCL CCG Audit Committee. It was approved by the ICB Board of Members on 4 July 2022.			
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12.	RELATED DOCUMENTS:	Conflicts of Interest Policy Counter Fraud, Bribery and Corruption Policy Disciplinary Policy Speaking Up (Whistleblowing) Policy CCG Constitution Clinical Procurement Policy Sponsorship and Joint Working With The Pharmaceutical Industry Policy; Standing Financial Instructions.
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Document Control

Date	Version	Action	Author
4 July 2022	1	Policy approved by Board of Members. It ensures exemplary Standards of Business Conduct to be adhered to by the Integrated Care Board	Christopher Hanson, Deputy Head of Governance and Risk.

NHS NORTH CENTRAL LONDON INTEGRATED CARE BOARD STANDARDS OF BUSINESS CONDUCT POLICY

Policy to ensure exemplary standards of business conduct to be adhered to by the Integrated Care Board

Version 1: 4th July 2022

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1 Introduction

- 1.1 This document sets out the Standards of Business Conduct Policy ('Policy') for NHS North Central London Integrated Care Board ('ICB').
- 1.2 The ICB, as a publicly funded organisation, has a duty to set and maintain the highest standards of conduct and integrity. The ICB expects the highest standards of corporate behaviour from Members of the ICB, members of the ICB's Committees and Sub-Committees, officers, staff, Clinical Leads, self-employed consultants, and contractors.

Aims

- 1.3 Public sector organisations must act impartially and honestly in the conduct of their business, and their staff must act in accordance with the seven principles of public life, the 'Nolan Principles' (see **Appendix A**)
- 1.4 Therefore, the Policy aims to establish the ICB's high standard of conduct and ensure that all relevant parties are aware of their own responsibilities regarding business conduct. The Policy also aims to protect the ICB, its decision-making, investments and stewardship of public funds from any impropriety.
- 1.5 The Policy provides guidance by:
 - a. Setting out consistent principles and standards of public service;
 - b. Advising appropriate courses of action for commonly arising situations; and
 - c. Facilitating good judgement and best practice

ICB Constitution and Policies

- 1.6 The Policy is designed to be as clear and comprehensive as possible. However, we operate in a dynamic and evolving work environment and, when applying or interpreting any of the ICB's policies, attention should be paid to the spirit of the policy as well as the letter. Good practice informed by policy and guidance, rather than policies alone, guarantees effective behaviour and the delivery of key objectives.
- 1.7 The policy should be read in conjunction with the NHS's and ICB's Constitution and the following policies (or equivalent(s)):
 - a. Conflict of Interest Policy;
 - b. Speaking Up (Whistleblowing) Policy;
 - c. Counter Fraud, Bribery and Corruption Policy;
 - d. Disciplinary Policy;
 - e. Equality & Diversity Policy;
 - f. Sponsorship and Joint Working With The Pharmaceutical Industry Policy;
 - g. Clinical Procurement Policy.
- 1.8 The Appendices to the Policy do not form part of the Policy and may be amended or updated by the Governance Team at any time without the need to formally amend this policy.

Legal Framework and Principles

- 1.9 The Policy is to assist with ICB compliance with the obligations under Sections 14Z30 and 14Z51 of the National Health Service Act 2006 and other relevant primary and secondary legislation.
- 1.10 The Policy encourages compliance with:
- a. NHS and ICB Constitution, Standing Financial Instructions, and Scheme of Delegation;
 - b. Standards for members of NHS Boards;
 - c. Code of Conduct for NHS Managers;
 - d. The 'Seven Principles of Public Life' (the 'Nolan Principles') included in **Appendix A**;
 - e. Good Governance Standards of Public Services principles; and
 - f. The Seven Key Principles of the NHS constitution, and the Equality Act 2010.
- 1.11 The Policy is to work alongside national and local guidance on child and adult safeguarding, as applicable.

Scope

- 1.12 This policy applies to all:
- Members of the ICB;
 - Members and Participants of the ICB's Committees and Sub-Committees;
 - Officers of the ICB, including Clinical Leads (which included Borough Clinical Directors and Clinical Leads); and,
 - ICB employees, self-employed consultants, contractors, and others involved/engaged in ICB commissioning activity.
- 1.13 ICB employees includes students, trainees, agency staff, seconded staff, prospective staff and joint appointments.
- 1.14 For the avoidance of doubt, nominees from NHS providers, local authorities and general practice providers of primary medical service must act in accordance with this policy.
- 1.15 Where the ICB is participating in a joint committee, or other governance arrangement with any other ICB:
- Any interests should be recorded on the register(s) of interest of each participating ICB; and
 - Any offer, acceptance or refusal of gifts, hospitality or sponsorship should be recorded on the register of gifts, hospitality, and sponsorship of each participating ICB.

Review of Policy

- 1.16 The Policy will be reviewed every two years by the Audit Committee. Further, the Policy will be reviewed subject to new or amended pertinent legislation/guidance published and/or evolution in best practice.

2 Constitution, Standing Financial Instructions, and Scheme of Reservation and Delegation

- 2.1 Individuals must carry out the ICB's obligations in accordance with the NHS Constitution, the ICB Constitution, Standing Financial Instructions, and Scheme of

Reservation and Delegation, Policies listed in paragraph 1.7, and Standards and Codes listed in paragraph 1.10 above.

- 2.2 In the case of doubt, the provisions of the Constitution, Standing Financial Instructions and Scheme of Reservation and Delegation take precedence.
- 2.3 In addition, a number of individuals are obliged to adhere to high professional standards set by their respective professional statutory bodies' Code of Conduct, or equivalent regimes.

3 Conflicts of Interest

- 3.1 In the performing of their duties, individuals are expected at all times to act with integrity and objectivity in the best interests of the ICB and the Public, and must not use their position for personal advantage or gain. Individuals are to avoid circumstances that give rise to an actual or potential Conflict of Interest.
- 3.2 Individuals will familiarise themselves, and act in accordance, with the ICB's Conflict of Interest Policy. Key definitions and extracts are set out below for ease of reference.
- 3.3 In addition to the Conflicts of Interest Policy the ICB has created a supplementary policy which builds upon and strengthens the provisions of the Conflicts of Interest Policy for joint working with the Pharmaceutical Industry. Staff must follow both the Conflicts of Interest Policy and the Sponsorship and Joint Working With The Pharmaceutical Industry Policy when working, or proposing to work, with the pharmaceutical industry.

Definition of a Conflict of Interest

- 3.3 A 'conflict of interest' is defined as "a set of circumstances by which a reasonable person would consider that an individual's ability to apply judgement or act, in the context of delivering, commissioning, or assuring taxpayer funded health and care services is, or could be, impaired or influenced by another interest they hold."¹
- 3.4 A conflict of interest may be:
 - a. Actual - there is a material conflict between one or more interests;
 - b. Potential – there is the possibility of a material conflict between one or more interests in the future.
- 3.5 As a general guide:
 - a. Perception of wrongdoing, impaired judgement or undue influence can be as detrimental as any of them actually occurring;
 - b. If in doubt it is better to assume a conflict of interest exists and manage it, rather than ignore it; and
 - c. Financial gain is not necessary for a conflict to exist.

Types of Interest

- 3.6 Conflicts of interests can be split into four different categories:
 - a. Financial Interests;
 - b. Non-financial Professional Interests;

¹ Paragraph 12 of NHS England's Managing Conflicts of Interest: Revised Statutory Guidance for CCGs 2017, published 16 June 2017.

- c. Non-financial Personal Interests; and
- d. Indirect Interests.

3.7 These are defined as follows:

- a. **Financial Interests** are where an individual may financially benefit from the consequences of a commissioning decision (for example, as a provider of services);
- b. **Non-financial Professional Interests** are where an individual may obtain a non-financial professional benefit from the consequences of a commissioning decision, such as increasing their professional reputation or status or promoting their professional career;
- c. **Non-financial Personal Interests** are where an individual may benefit personally in ways which are not directly linked to their professional career and do not give rise to a direct financial benefit.
- d. **Indirect Interests** are where an individual has a close association with an individual who has a financial interest, a non-financial professional interest or a non-financial personal interest in a commissioning decision (as described above).

Declarations of Interest

- 3.7 The ICB will ensure that those individuals identified in the scope of the Policy regularly declare any conflict or potential conflict. The individual is to declare the conflict to the ICB in any event within 28 days of identification of the conflict.
- 3.8 The ICB will ensure that regular declarations of interest are made and recorded, and in any event:
 - On appointment of an individual;
 - At meetings;
 - On changing role or responsibility or other relevant change of circumstance; and
 - When prompted by the CCG, annually.
- 3.9 Declarations are made by completing and signing the Declaration of Interest form (Schedule 3 of the Conflict of Interest Policy) and sending the signed declaration to the Board Secretary.
- 3.10 In the case of declarations made during an ICB meeting, the minutes ought to reflect the method by which the particular conflict management solution was arrived at. The Governance and Risk Team should be contacted for further assistance.

Register of Interest

- 3.11 The CCG will maintain the following registers of interests:
 - Members of the ICB;
 - Members of the ICB's Committees and Sub-Committees;
 - Officers of the ICB, including Clinical Leads; and,
 - ICB employees, Contractors, and others involved/engaged in ICB commissioning activity.
- 3.12 The registers of interests will be published annually on the ICB's website, in addition to the ICB's Register of Gifts, Hospitality and Sponsorship, as well as being made available at the ICB's headquarters. They will be included in the ICB's Annual Report and Annual Governance Statement.

Practical Guidance

- 3.13 Practical guidance in relation to Managing Conflicts of Interest during meetings and throughout the Commissioning Cycle can be found in the ICB's Conflicts of Interest policy.

4 Outside or Secondary Employment

- 4.1 Individuals are required to seek approval from their line manager if they are engaged in or wish to be engaged in outside or secondary employment. The ICB reserves the right to refuse permission where it reasonably believes a conflict will arise.
- 4.2 Such outside or secondary employment must be declared in accordance with the ICB's Conflict of Interest Policy. The individual in question may be subject to further provisions of the ICB's HR policies.

5 Declaration of Gifts and Hospitality

- 5.1 For details relating to the acceptance, declaration, and publication of Gifts, Hospitality, Donations, and Sponsorship see the ICB's Conflict of Interest policy. Individuals will familiarise themselves, and act in accordance, with the ICB's Conflict of Interest policy. Those working (or proposing to work) with the pharmaceutical industry must also act in accordance with the Sponsorship and Joint Working With The Pharmaceutical Industry Policy. Key definitions and extracts from the Conflicts of Interest Policy are set out below for ease of reference.

Gifts

- 5.2 A 'gift' is defined as "any item of cash or goods, or any service, which is provided for personal benefit, free of charge, or at less than its commercial value"²

Nature of gift	Management action
Any gift that may affect, or be seen to affect, the recipient's professional judgement, that is not otherwise permitted under the Conflicts of Interest Policy.	Gift to be declined and a Declaration of gifts, hospitality, and sponsorship be submitted.
Personal gift of cash or cash equivalent (e.g. vouchers).	Gift to be declined and a Declaration of gifts, hospitality, and sponsorship be submitted.
Gifts from suppliers or contractors doing business, or likely to do business with the ICB, in excess of £6.	Gift to be declined and a Declaration of gifts, hospitality, and sponsorship be submitted.
Gifts from suppliers or contractors doing business, or likely to do business with the ICB, valued £6 or less.	Gift may be accepted and need not be declared.
Gifts valued £50 or under, from sources other than suppliers or contractors doing business, or likely to do business with the ICB.	Gift may be accepted and need not be declared.

² Paragraph 32 of NHS England's Managing Conflicts of Interest: Revised Statutory Guidance for CCGs 2017, published 16 June 2017.

Gifts valued in excess of £50, from sources other than suppliers or contractors doing business, or likely to do business with the ICB.	Gift may only be accepted on behalf of the ICB, and a Declaration of gifts, hospitality, and sponsorship be submitted.
Donations from suppliers or contractors doing business, or likely to do business with the ICB.	Donation to be declined and a Declaration of gifts, hospitality, and sponsorship be submitted. Directors can authorise the acceptance of such donations in exceptional circumstances. The reason for the acceptance must be recorded in the Declaration.
Multiple gifts received over a 12 month period, where the cumulative value of the gifts exceeds £50.	Gifts may only be accepted on behalf of the ICB, and a Declaration of gifts, hospitality, and sponsorship be submitted.

Hospitality

5.3 Hospitality means offers of meals, refreshment, travel, accommodation, and other expenses in relation to attendance at meetings, conferences, education and training events etc.³

Nature of hospitality	Management action
Any hospitality that may affect, or be seen to affect, the recipient's professional judgement.	Hospitality to be declined and a Declaration of gifts, hospitality, and sponsorship be submitted.
Valued under £25.	Hospitality may be accepted and need not be declared.
Valued between £25 and £75 (inclusive).	Hospitality may be accepted and a Declaration of gifts, hospitality, and sponsorship be submitted.
Valued in excess of £75.	Hospitality to be declined and a Declaration of gifts, hospitality, and sponsorship be submitted. Directors can authorise the acceptance of such hospitality in exceptional circumstances. The reason for the acceptance must be recorded. In the Declaration.
Hospitality offered by actual or potential suppliers or contractors, where it is reasonable and proportionate.	Hospitality may be accepted and a Declaration of gifts, hospitality, and sponsorship be submitted, where authorised by a Director. The reason for the acceptance must be recorded. In the Declaration.
Hospitality offered by actual or potential suppliers or contractors in the following circumstances:	Hospitality to be declined and a Declaration of gifts, hospitality, and sponsorship be submitted.

³ Paragraph 37 of NHS England's Managing Conflicts of Interest: Revised Statutory Guidance for CCGs 2017, published 16 June 2017.

<ul style="list-style-type: none"> • During a related tendering exercise; • Where a related contract is due to come to an end; • Where the performance of a contract is in question; • 'Linked sponsorship arrangements' where external sponsorship is linked to the ICB procurement of goods and services; and • Other circumstances where acceptance might compromise the staff member or ICB. 	
<p>Modest travel and accommodation costs, related to attendance at events.</p>	<p>Hospitality may be accepted and a Declaration of gifts, hospitality, and sponsorship be submitted.</p>
<p>Travel and accommodation costs, beyond modest or of a type the ICB would not usually offer.</p>	<p>Hospitality to be declined and a Declaration of gifts, hospitality, and sponsorship be submitted.</p> <p>Head of Governance and Risk can authorise the acceptance of such hospitality in exceptional circumstances. The reason for the acceptance must be recorded in the Declaration.</p>

Declarations of Gifts, Hospitality and Sponsorship

- 5.4 Declarations are made by completing and signing the Declaration of Gifts, Hospitality, and Sponsorship (Schedule 5 of the ICB's Conflict of Interest policy) and sending the signed declaration to the ICB Board Secretary. It may also be necessary to sign and submit a Declaration of Interest, circumstances dependant.

6 Charitable Collections

- 6.1 The ICB supports individuals who wish to undertake charitable collections amongst immediate colleagues. The ICB's authorisation of such charitable collections does not equate to endorsement of the charity in question or its principles, methods, or outcomes.
- 6.2 Any charitable collections which reference the ICB must be authorised in writing by a director in advance of the event and/or collection(s).

7 Political Activity

- 7.1 Any political activity should not identify an individual's relationship with the ICB. Conferences or functions run by a party political organisation should not be attended in an official capacity, except where the same has been authorised in writing by a director in advance of the event.
- 7.2 All individuals within the scope of this policy should declare any formal links to political parties on their Declaration of Interests Form.

8 Personal Conduct

Public Comment

- 8.1 All Individuals must respect, promote, and act consistently with the ICB's corporate decisions, whether agreed with or otherwise. The private views of Individuals can be made public, however, it must be made clear that they are expressing their personal view and not that of the ICB.
- 8.2 In speaking in public, whether to the media, in a public forum, in a private forum or informal discussion (including expressing views on or through Social Media), Individuals should ensure that they reflect current policies or the view of the ICB. For any public forum or media interview approval is required from the ICB Board, the Chair and/or Chief Executive or nominated deputies, and the ICB's Communication Team prior to the event or as soon as is practical thereafter.
- 8.3 Comments made in the circumstances outlined in 8.1 and 8.2 above ought to be well considered, sensible, well informed and made in good faith. They are to be made in the public interest, without malice, and that they may enhance the reputation of the ICB. Nothing in this policy generally or this section 8 prohibits or restricts an individual's ability to make a protected disclosure in line with the Counter Fraud, Bribery and Corruption Policy or the ICB's Speaking Up (Whistleblowing) Policy.

Confidentiality

- 8.4 Individuals must at all times act in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2016 and maintain the confidentiality of information of any type, including but not restricted to patient information; personal information relating to officers; and commercial information. This duty remains after the Individual leaves the ICB, however previously retained.
- 8.5 For the avoidance of doubt, the provisions of the Policy do not prevent the disclosure of information where there is a lawful basis for doing so. Staff should refer to the suite of ICB Information Governance policies for detailed information.

Private Financial matters

- 8.6 No individual may gamble when on duty or on ICB premises, with the exception of small lottery inter-colleague syndicates or sweepstakes related to national events such as the World Cup or Grand National where no profits are made or the lottery is wholly for purpose that are not for private or commercial gain (e.g. for charitable purposes).
- 8.7 Individuals are encouraged not to lend or borrow money, whether informally or as a business, to or from their work colleagues.
- 8.8 Trading on the ICB's premises is prohibited, whether for personal gain or on behalf of others. This prohibition includes but is not limited to flyers advertising services/products in common areas.
- 8.9 Individuals are to familiarise themselves with and act in accordance with any HR policy or guidance in relation to Individual Voluntary Arrangements, County Court Judgments, Bankruptcy/Insolvency and or Criminal convictions.

9 Raising Concerns

Identifying and raising concerns

- 9.1 Full compliance with the requirements of this policy is expected of all individuals in scope of the policy in order to demonstrate the ICB's commitment to openness and transparency.
- 9.2 Concerns regarding a suspected breach of, or non-compliance with, this policy should be referred to the Governance and Risk Team in the first instance, as soon as is reasonably possible. These may be referred to the Head of Governance and Risk on an informal basis, if necessary, for further action. Any suspicion of fraud relating to a breach of this policy should be reported to the Local Counter Fraud Specialists for investigation.
- 9.3 Actual or suspected breaches of this policy should be reported to the Head of Governance and Risk. Breaches which relate to Conflicts of Interest may also be escalated to the Conflicts of Interest Guardian.
- 9.4 Where a breach relating to Conflicts of Interest is identified the Head of Governance will investigate and determine whether a breach has occurred and/or identify and implement a resolution. The Head of Governance may escalate the matter to the responsible director and the Conflicts of Interest Guardian for further investigation. The Head of Governance will assess whether it is necessary to report the breach further, internally or externally.
- 9.5 Where a breach relating to Conflicts of Interest is identified and it is not possible to implement a resolution, the Head of Governance and Risk will complete a Conflict of interest policy form, and record it on the Conflicts of interest breach register. Anonymised details of breaches will be published on the ICB's website for the purpose of learning and development. If the breach is material NHS England is to be notified using the normal reporting mechanisms, and reported to the ICB Audit Committee. The process for managing breaches of the Conflicts of Interest policy is set out at Appendix B of this policy.
- 9.6 Schedule 11 of the Conflicts of Interest Policy is the form template and 12 is the register.

Taking action in response to breaches

- 9.7 Action taken in response to breaches of this policy will be in accordance with the ICB's disciplinary procedures and could involve organisational leads for staff support (e.g. Human Resources), fraud (e.g. Local Counter Fraud Specialists), members of the management or executive teams and the ICB's auditors.
- 9.8 Breaches could require action in one or more of the following ways:
- Clarification or strengthening of existing policy, process and procedures;
 - Legal action and/or informal or formal disciplinary action taken against staff or others. This includes dismissal and termination of contract;
 - Escalation to external parties. This might include referral of matters to external auditors, the NHS Counter Fraud Authority, the Police, statutory health bodies (such as NHS England, NHS Improvement or the CQC), and/or health professional regulatory bodies.

Breaches and Fraud

- 9.9 The Fraud Act 2006 defines a number of offences including:
- Fraud by false representation;
 - Fraud by failing to disclose information and;
 - Fraud by abuse of position.
- 9.10 The offender's conduct must have been dishonest and their intention was to make a gain, or cause a loss (or the risk of a loss) to another. Fraud carries a maximum sentence of 10 years imprisonment and /or a fine if convicted in the Crown Court or 6 months imprisonment and/or a fine in the Magistrates' Court.
- 9.11 Therefore, if an individual becomes aware of any financial or other irregularities or impropriety which involve evidence or suspicion of fraud, bribery or corruption they should contact the Local Counter Fraud Specialists in accordance with the Counter Fraud, Bribery and Corruption Policy with a view to an appropriate investigation being conducted and potential prosecution being sought. Local Counter Fraud Specialists' contact details are set out in Schedule 1 of the Conflicts of interest policy.
- 9.12 Reports of fraud and bribery can also be made directly to the NHS Counter Fraud Authority: <https://cfa.nhs.uk/reportfraud> or 0800 028 4060

Breaches and Bribery

- 9.13 Committing an act of bribery may result in a penalty of up to ten years' imprisonment, a fine, or both. The ICB may also be exposed to a conviction punishable with an unlimited fine.
- 9.14 Offences cover the offering, promising or giving of a financial or other advantage and the requesting, agreeing to receive or accepting of a financial or other advantage where the overall intention of such an action is to bring about an improper performance or a relevant function or activity.
- 9.15 The ICB will have a defence to the corporate offence if it can show that, despite a particular case of bribery, it nevertheless had 'adequate procedures' in place to prevent persons associated with it from committing bribery offences in line with the Ministry of Justice guidance⁴. The adequate procedures should be informed by the following six principles:
- Proportionate procedures;
 - Top-level commitment;
 - Risk assessment;
 - Due diligence;
 - Communication (including training);
 - Monitoring and review.

10 Related Documents

- 10.1 The following documents contain information that relates to this policy:
- Conflicts of Interest Policy;
 - Counter Fraud, Bribery and Corruption Policy;

⁴ <https://www.justice.gov.uk/downloads/legislation/bribery-act-2010-guidance.pdf>

- Speaking Up (Whistleblowing) Policy;
- Disciplinary Policy;
- Equality and Diversity Policy;
- Clinical Procurement Policy;
- Sponsorship and Joint Working With The Pharmaceutical Industry Policy;
- The ICB Constitution;
- Standing Financial Instructions.

11 Dissemination

- 11.1 This policy will be published on the ICB's staff intranet and website for access by all ICB employees and other relevant individuals.

12 Advice

- 12.1 Advice on the Policy can be sought from the Board Secretaries and/or the Governance and Risk Team. Advice in relation to interpretation requirements and policy and procedure can also be sought from the Governance and Risk Team.

13 Compliance Monitoring

- 13.1 The Audit Committee will require assurance annually on compliance with the Policy as part of its assurance programme.

The Nolan Principles

- Selflessness – Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.
- Integrity – Holders of public office should not place themselves 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, holders of public office should make choices on merit.
- Accountability – Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
- Openness – Holders of public office should be as open as possible about all the decisions and actions they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
- Honesty – Holders of public office 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 – Holders of public office should promote and support these principles by leadership and example.



