



SOLENT LOCAL ENTERPRISE PARTNERSHIP

SOLENT LEP CODE OF CONDUCT

February 2018

Introduction

The Local Enterprise Partnership National Assurance Framework requires all LEPs to establish a local assurance framework which sets out its rules governing:

- the Local Enterprise Partnership board membership
- sub-groups and their membership requirements
- the roles and responsibilities of the main Local Enterprise Partnership board and any permanent sub-boards, with a particular focus on who is responsible for each type of decision
- the relationship between the Local Enterprise Partnership board and the supporting local authority partnership arrangements that enable collective engagement with all local authority leaders in decision-making on growth priorities
- the arrangements for the lawful and effective implementation and delivery of projects
- its commitment to diversity, including a diversity statement
- the conduct for all board members (see gov.uk guidance "The 7 principles of public life")
- arrangements for cross LEP working

Full details of the above requirements are available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/567528/161109_LEP_Assurance_Framework.pdf

The Solent LEP has a well-established Local Assurance Framework and this is available at: <https://solentlep.org.uk/media/2247/solent-lep-assurance-framework-feb-2018.pdf>

The Solent LEP is registered as a company limited by guarantee incorporated on 18 March 2011. Further details on the governance arrangements for the Company are set out in the Company's Articles of Association, which are available at:

<https://solentlep.org.uk/media/1262/articles-of-association.pdf>

Within this context, all Solent LEP Directors and Solent LEP Representatives (including: Chairs and Members of dedicated delivery sub-panels of the Solent Local Enterprise Partnership, Section 151 Officers and Chief Executive Officers of any accountable body organisation operating on behalf of the Solent Local Enterprise Partnership and any other persons with significant influence over the activities of the Solent Local Enterprise Partnership - for example, Solent LEP staff and senior points of contact at accountable body organisations such as legal and financial contacts) are required to sign-up to, and act in accordance with, the following code of conduct.

TOGETHER.STRONGER



**SOLENT
LOCAL
ENTERPRISE
PARTNERSHIP**

Part 1: General Provisions and Interpretation

This Code of Conduct is adopted by the Solent Local Enterprise Partnership (LEP) pursuant to its obligations to promote and maintain high standards of conduct by Directors and Representatives of the LEP including any entity acting as its Accountable Body.

This Code is based on and is consistent with the following principles:

Selflessness: Holders of public office should act solely in terms of the public interest.

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.

Objectivity: Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

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.

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.

Honesty: Holders of public office should be truthful.

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. leadership and example.



**SOLENT
LOCAL
ENTERPRISE
PARTNERSHIP**

General obligations

1. You must treat others with respect.
2. You must not bully any person.
3. You must not intimidate, or try to intimidate, anyone who has complained about you or who may be involved with a complaint about you.
4. You must not do anything which compromises the impartiality of the Solent LEP and/or Portsmouth City Council as the Accountable Body of the Solent, Solent LEP's officers and officers of the Accountable body.
5. You must not disclose confidential information (other than in very limited circumstances permitted by law, and following consultation with the LEP's Company Secretary).
6. You must not prevent a person from gaining access to information to which they are entitled.
7. You must not conduct yourself in a manner which could reasonably be regarded as bringing your office or Solent LEP and/or Portsmouth City Council as the Accountable Body of the Solent LEP into disrepute.
8. You must not use or attempt to use your position as a LEP Director or Representative improperly to confer on or secure for yourself or any other person an advantage or disadvantage.
9. You must, when using or authorising the use by others of the resources of the Solent LEP and/or Portsmouth City Council as the Accountable Body of the Solent LEP, act in accordance with the Solent LEPs Articles of Association and Assurance Framework, and ensure that the resources are not used improperly for political (including party political) or personal purposes.
10. When reaching decisions, you must have regard to relevant advice from the Solent LEPs officers and/or Portsmouth City Council as the Accountable body of the Solent LEP, and give reasons for decisions.



**SOLENT
LOCAL
ENTERPRISE
PARTNERSHIP**

11. You must have regard to any applicable Local Authority Code of Publicity made under the Local Government Act 1986 or otherwise. ¹

12. All Directors and Representatives are required to act in accordance with the LEPs Articles of Association, which are available at:

<https://solentlep.org.uk/media/1262/articles-of-association.pdf>

13. All Directors are required to comply with their statutory duties as directors, including the obligations to promote the success of the Solent LEP, not to accept benefits from third parties in their capacity as a director, to declare their interests in transactions (see principle 15 below), to avoid conflict situations that are not authorised by the other directors, and to exercise independent judgment in your role as a director.

14. All Directors and Representatives have a duty to act in accordance with the LEPs Local Assurance Framework, which is available at:

<https://solentlep.org.uk/media/2247/solent-lep-assurance-framework-feb-2018.pdf>

15. All Directors and Representatives have a duty to act in accordance with the LEPs Register of Interest Policy (available at <https://solentlep.org.uk/media/2250/solent-lep-register-of-interest-template.pdf>)

16. All Directors must, within 28 days of taking office as a Board Member, notify the Solent LEP Chief Executive and Accountable Body's S151 Officer of any disclosable pecuniary interest, where the pecuniary interest is yours, your spouse's or civil partner's, or is the pecuniary interest of somebody with whom you are living with as a spouse, or as if you were civil partners.

17. All Directors must, within 28 days of taking office, notify the Solent LEP Chief Executive and Accountable Body's S151 Officer of any non-pecuniary interest which your LEP has decided should be included in the register or which you consider should be included if you are to fulfil your duty to act in conformity with the Seven Principles of Public Life. These non-pecuniary interests will necessarily include your membership of any Trade Union.

18. All Directors must review their individual register of interest before each board meeting and decision making committee meeting. If an interest has not been entered onto the LEP's register, then the member must disclose the interest at any meeting of the LEP at which they are present, where they have a disclosable interest in any matter being considered and where the matter is not a 'sensitive interest'.

¹ Publicity should be: lawful, cost effective, objective, even-handed, appropriate, have regard to equality and diversity and be issued with care during periods of heightened sensitivity. Full code details available [here](#).



**SOLENT
LOCAL
ENTERPRISE
PARTNERSHIP**

19. Following any disclosure of an interest not on the LEP register or the subject of pending notification, Solent LEP Directors must notify the LEP Chief Executive and S151 Officer of the interest within 28 days beginning with the date of disclosure.

20. Unless dispensation has been granted, Solent LEP Directors may not participate in any discussion of, vote on, or discharge any function related to any matter in which there is a pecuniary interest. Additionally, Solent LEP Directors must observe the restrictions your LEP places on your involvement in matters where you have a pecuniary or non pecuniary interest as defined by your LEP.

21. All Directors and Representatives have a duty to declare their interests (direct or indirect) in transactions or arrangements involving the Solent Local Enterprise Partnership and you should not lobby other LEP Directors where you have declared such an interest.

22. All Directors and Representatives have a duty to act in accordance with the Solent LEPs Register of Events, gifts and hospitality policy (available at: https://solentlep.org.uk/media/1265/register_of_events_attended_hospitality_and_gifts_received_form.pdf)



**SOLENT
LOCAL
ENTERPRISE
PARTNERSHIP**

2. Scope

This Code applies to all Solent LEP Directors and Solent LEP Representatives (including: Chairs and Members of dedicated delivery sub-panels of the Solent Local Enterprise Partnership, Section 151 Officers and Chief Executive Officers of any accountable body organisation operating on behalf of the Solent Local Enterprise Partnership and any other persons with significant influence over the activities of the Solent Local Enterprise Partnership - for example, Solent LEP staff and senior points of contact at accountable body organisations such as legal and financial contacts) when acting in their official capacity, or when giving the impression that they are acting as a representative of the Solent LEP and/or Portsmouth City Council as the Accountable Body of the Solent LEP.

Where a Director or Representative has a role acting on behalf of more than one organisation, but is acting on behalf of the Solent LEP and/or Portsmouth City Council as the Accountable Body of the Solent LEP, such Director or Representative is, for the avoidance of doubt, bound by this Code of Conduct.

3. Declaration

I confirm that I have read and understood my obligations under the Solent LEP Code of Conduct.

Name:

Position(s) at Solent LEP:

Signed:

Dated: