



Natural England Board Code of Conduct

1. Natural England is here to conserve and enhance the natural environment, for its intrinsic value, the wellbeing and enjoyment of people and the economic prosperity that it brings.
2. As Board Members of Natural England, we expect to carry out our roles with integrity, honesty, objectivity and impartiality. This Code sets out, based on these values, the standards of behaviour expected of all Board Members of Natural England. Specific guidance is shown in Annex A. In this Code:
 - 'integrity' is putting the obligations of public service above our own personal interests;
 - 'honesty' is being truthful and open;
 - 'objectivity' is basing our advice and decisions on rigorous analysis of the evidence;
 - 'impartiality' is acting solely according to the merits of the case and not being influenced by undue commercial, social or political pressure.
3. These values support good governance and ensure the achievement of the highest possible standards in all that Natural England does. This in turn helps Defra, our sponsoring department, and the wider public service to gain and retain the respect of Ministers, Parliament, our stakeholders, customers and the public.

Integrity

4. We will:
 - fulfil our duties and obligations responsibly;
 - always act in a way that deserves and retains the confidence of all those with whom we have dealings;
 - make sure public money and other resources are used properly and efficiently;
 - deal with the public and their affairs fairly, efficiently, promptly, effectively and sensitively, to the best of our ability;
 - handle information as openly as possible within the legal framework;
 - comply with the law and uphold the administration of justice.
5. We will not:
 - misuse our official position, for example by using information acquired in the course of our official duties to further private interests or those of others;
 - accept gifts or hospitality or receive other benefits from anyone which might reasonably be seen to compromise our personal judgment or integrity;
 - disclose official information without authority. This duty continues to apply after leaving Natural England.

Honesty

6. We will:
 - discuss the facts and relevant issues truthfully, and correct any errors as soon as possible;
 - use resources only for the authorised public purposes for which they are provided.

7. We will not:
 - deceive or knowingly mislead Ministers, Parliament or others;
 - be influenced by improper pressures from others or the prospect of personal gain.

Objectivity

8. We will:
 - provide information and advice, including advice to Ministers, on the basis of the evidence, and accurately present the options and facts;
 - take decisions on the merits of any case;
 - take due account of expert and professional advice.

9. We will not:
 - ignore inconvenient facts or relevant considerations when providing advice or making decisions;
 - frustrate the implementation of policies once decisions are taken by declining to take, or abstaining from, action which flows from those decisions.

Impartiality

10. We will:
 - carry out our responsibilities in a way that is fair, just and equitable and reflects Natural England's commitment to equality and diversity.

11. We will not:
 - act in a way that unjustifiably favours or discriminates against particular individuals or interests.

Staff Code of Conduct including Core Behaviours

12. We are aware of, and support, the core behaviours that have been adopted by Natural England Management team for all staff covering:
 - Understanding Natural England's purpose and priorities and describing them confidently inside and outside the organisation;
 - Mirroring Natural England in being practical, helpful, trustworthy and impartial, and creative in problem solving;
 - Understanding and exceeding customer expectations;
 - Understanding what is expected by Natural England and their team and delivering it;

- Developing and sustaining collaborative relationships inside and outside the team;
- Listening to and respecting colleagues, but balancing the interests of the individual whilst resolving any issue.

On behalf of the Board of Natural England

Paul Christensen CBE,

Chair, Natural England
February 2012

Guidance on relevant issues

Registering personal interests

1. You are required to register, via Board Services, any personal interests that may be considered a potential conflict of interest with your role in Natural England. You should regularly review your register of interests and such interests should be declared at appropriate times in both internal and external meetings.
2. At the beginning of the relevant meeting, you should formally declare any interests and potential conflicts, giving the Chair the opportunity for advising of any process points for handling them. Options might include:
 - a. absenting yourself from the meeting at the relevant agenda item;
 - b. remaining in the meeting but not taking part in discussion;
 - c. taking part in discussion but abstaining when it comes to the decision or vote;
 - d. taking full part in the item.
3. You must not accept a directorship, except as a nominee of Natural England, in any company holding a contract with Natural England without the Chair's approval.

Potential Conflicts of interest through membership of Board of Natural England and other Defra Network bodies.

4. Members should agree with the Chairs and Chief Executives of any bodies that they represent, and with their respective Sponsors in Defra, those generic areas that might give rise to potential sensitivities because of their board membership of multiple organisations.
5. Ahead of board meetings, members in these positions should assess board papers for potential conflicts—real or perceived—having regard for the particular areas of sensitivity and alert the Chair and Chief Executive of the bodies appropriate to the identified potential conflicts and agree a process for dealing with them.
6. For matters that arise outside of board meetings, members should draw attention to the “duality” of their role in cases where the agreed areas of sensitivity are in play.
7. Members will be expected to abide by corporate decisions taken by the respective boards, behaving responsibly and with respect for the need for confidentiality and non-disclosure where appropriate. For example, it would not normally be appropriate to disclose the views of individual Board Members on an issue, even where it was appropriate to share the collective view of one Board with the other. However, members in this situation should try to ensure that the perspective of the other board is made transparent and taken into account in any matters where there is a serious difference of opinion.
8. Where appropriate, members could offer to broker negotiation in such matters, but will only proceed to do so with the approval of both sets of Chairs and Chief Executives.
9. These guidelines also apply to the Member's role in any Board Sub Committees or subsidiary groups.

Commercial interaction with Natural England

10. You should register any interests you have in organisations involved with Natural England in any commercial relationship. You may not buy assets from or sell assets to Natural England in a personal capacity.

Use of Public Funds

11. You have a duty to ensure the safeguarding of public funds and the proper custody of assets, which have been publicly funded.
12. You must carry out your fiduciary obligations responsibly – that is, take appropriate measures to ensure that the body uses resources efficiently, economically and effectively, avoiding waste and extravagance. It will always be an improper use of public funds for public bodies to employ consultants or other companies to lobby Parliament, Government or political parties.

Outside occupations or involvement in other organisations

13. You should disclose any interests you have in areas that may co-incide with the interests of Natural England and disclose all directorships or trusteeships in any area of activity.

Standing orders

14. You are expected to comply fully with the Standing Orders that govern the conduct of Board meetings of Natural England and any other Government bodies of which you may be a member.

Political Activities

15. As a Board Member in an organisation that advises elected members of government and carries out government policies, you must behave with discretion in matters of public and political controversy so that your impartiality is above suspicion.

Authority to act on behalf of Natural England

16. All agreements and contracts, both in pursuance of Natural England's statutory objectives or commercially for sale or purchase, or quasi-contracts formal or informal, require approval in accordance with the approved Framework Agreement, Board Scheme of Delegation and Financial Memorandum. These recognize the Board as a corporate body and the separate roles of the Chair and the Chief Executive. You must abide by these at all times.

Acceptance of Gifts, Rewards and Hospitality

17. There are no circumstances in which it is permissible for you to accept anything that could be construed as a personal reward for a service or transaction performed as part of your Board duties. The general principle is that gifts and hospitality should be refused. There are exceptions to this rule in the cases of: gifts of a trivial or inexpensive and seasonal nature; or hospitality accepted as part of normal and public ongoing relations with other bodies (see Annex B).

18. You should record the offer or receipt of any kind of gift or hospitality through the Board's Gifts and Hospitality Register, held by Board Services. You should not normally accept such an offer or gift; refusing it with a suitable explanation. The guiding principles are:
- your conduct must not foster the suspicion of any conflict between your official duty and your private interest;
 - your actions whilst acting in an official capacity must not give the impression (to any member of the public, organisation with whom you deal or to colleagues) that you have been or may have been influenced by a gift or consideration to show favour or disfavour to any person or organisation;
 - gifts or hospitality must be refused if you are in any doubt about the propriety of accepting them.
19. It does not matter that there may, in fact, be no conflict of interest or impropriety; any conduct that might foster such a suspicion is wrong. Subsequent payment for, or reciprocity of, any gift or hospitality does not legitimise its unauthorised receipt. Nor is practice in the private sector any justification for a breach of the standards of conduct required in the different circumstances of public service.
20. The onus is on you to record every case, with your assessment of the correct course of action in the light of this guidance. The risk of causing offence by refusal is not sufficient reason on its own for acceptance where it would otherwise be improper to accept.
21. The requirement to report gifts, hospitality and awards arising from official activity applies equally where the beneficiary is a relative or associate, e.g. where a gift or hospitality is made to a spouse/partner or close friend.

Gifts from Overseas Governments and Organisations

22. Special considerations apply to gifts and hospitality from overseas governments or organisations. Although the principles set out above apply generally to such gifts, there may be occasions when refusal could appear discourteous or a gift should be offered in return. Advice should be sought in cases of doubt.
23. The normal Customs rules apply to gifts received abroad in a private capacity and need not be declared to Customs unless the value together with other articles acquired exceeds the normal allowance for gifts and all other goods.
24. Special arrangements exist for international goodwill gifts received by Board Members in their representative capacity. Further advice on the details of this arrangement are available.

Confidentiality of Information

25. You are responsible for maintaining the confidentiality of any Natural England's data or information that you handle. Information can be classified at different levels of protection and appropriate advice should be sought if dealing with such items.
26. All electronic transactions made using Natural England equipment are the property of Natural England. All computer transactions, including e-mail and web activity are stored, backed up and recoverable in case of loss or

accidental deletion. They will be inspected only if there are concerns raised that the facility is being abused.

Acceptance of Gifts, Rewards and Hospitality

Gifts	
Offers which might be acceptable	Offers which SHOULD NOT be accepted
<p>Isolated trivial or inexpensive gifts e.g. pocket diaries, calendars etc.</p>	<p>All other gifts, including the offer of items or services at trade or discount prices: e.g. clothing, goods, holidays or holiday travel.</p>

Hospitality	
Offers which might be acceptable	Offers which SHOULD NOT be accepted
<p>Modest conventional hospitality, provided that:</p> <ol style="list-style-type: none"> acceptance is limited to isolated occasions; acceptance can be shown to be in the interest of Natural England. <p>Examples may include:</p> <ul style="list-style-type: none"> • drinks; • meals (particularly working lunches); • appropriate external dinners and conferences; • overnight accommodation at a colleague or contact's home. 	<p>All other hospitality including:</p> <ol style="list-style-type: none"> invitations to frequent or extravagant social functions (particularly invitations from the same source); hotel expenses or other subsistence; travelling expenses.