



Department
for Environment
Food & Rural Affairs

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Triennial Review of the National Forest Company

Principles of Corporate Governance

November 2013

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Summary

1. The Triennial Review of the National Forest Company (NFC) concluded that it is performing well delivering across its range of corporate plan performance indicators and has good governance systems in place. These meet the financial accountability and performance monitoring requirements of Defra from its NDPBs. However, certain areas were identified for improvement including the lack of local representation on the board or wider governance processes.
2. This assessment provides further details about NFC's corporate governance arrangements. It has been carried out in accordance with Cabinet Office Triennial Review Guidelines¹ on the controls, process and safeguards that NFC has in place as an executive Non-Departmental Public Body (NDPB).
3. Information on NFC's performance and governance arrangements is published on its website.

¹ Cabinet Office Guidance on Reviews of Non Departmental Public bodies, p8 and Annex B, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/62129/Cabinet_Office_Guidance_on_Reviews_of_Non_Departmental_Public_Bodies.pdf

Table 1 – The National Forest Company – Principles of Governance

Principles of Corporate governance for an NDPB	Description	Assessment of the NFC
Accountability		
<u>Statutory Accountability</u>		
<u>Principle</u>	The public body complies with all applicable statutes and regulations, and other relevant statements of best practice.	
Supporting Provisions	The public body must comply with all statutory and administrative requirements on the use of public funds. This includes the principles and policies set out in the HMT publication “Managing Public Money” and Cabinet Office/HM Treasury spending controls	<p>Comply -The NFC fully complies with all their statutory and administrative requirements on the use of public funds.</p> <p>The NFC follows the standards set out in Managing Public Money.</p>
	The public body must operate within the limits of its statutory authority and in accordance with any delegated authorities agreed with the sponsoring department.	<p>Comply - This is set out in Annex D to Framework Document.</p> <p>http://www.nationalforest.org/document/reports/framework_document.pdf</p> <p>Internally, delegated authorities to officers are approved by NFC Board.</p>
	The public body should operate in line with the statutory requirements and spirit of the Freedom of	Comply - The NFC operates in line with the relevant Freedom of Information Act guidance and instructions.

	Information Act 2000. It should have a comprehensive Publication Scheme. It should proactively release information that is of legitimate public interest where this is consistent with the provisions of the Act.	The NFC operates within a Publication Scheme http://www.nationalforest.org/about_us/pub/index.php
	The public body must be compliant with Data Protection legislation.	Comply - The NFC shows responsibility for maintaining accurate personnel records, in accordance with all Data Protection requirements.
	The public body should be subject to the Public Records Acts 1958 and 1967.	Comply- The NFC are subject to the Public Records Acts of 1958 and 1967.
<u>Accountability for Public Money</u>		
<u>Principle</u>	The Accounting Officer of the public body is personally responsible and accountable to Parliament for the use of public money by the body and for the stewardship of assets.	
Supporting provisions	There should be a formally designated Accounting Officer for the public body. This is usually the most senior official (normally the Chief Executive).	Comply - The CEO is designated as NFC's Accounting Officer (AO) by Defra's Principal Accounting Officer.
	The role, responsibilities and accountability of the Accounting Officer should	Comply - The NFC CEO was given AO status upon her appointment in 2006. .

	<p>be clearly defined and understood. The Accounting Officer should have received appropriate training and induction. The public body should be compliant with the requirements set out in “Managing Public Money”, relevant Dear Accounting Officer letters and other directions. In particular, the Accounting Officer of the NDPB has a responsibility to provide evidence-based assurances required by the Principal Accounting Officer (PAO). The PAO requires these to satisfy him or herself that the Accounting Office responsibilities are being appropriately discharged. This includes, without reservation, appropriate access of the PAO’s internal audit service into the NDPB.</p>	<p>The CEO may delegate the day-to-day administration of their Accounting Officer and Consolidation Officer responsibilities to other employees in NFC.</p>
	<p>The public body should establish appropriate arrangements to ensure that public funds:</p> <p>are properly safeguarded;</p> <p>used economically, efficiently and effectively;</p>	<p>Comply - Internally, effective systems of control exist to safeguard funds which are regularly subjected to audit.</p> <p>Proposals for utilisation of funds are set out in annual Business Plan agreed by NFC Board and approved by Defra.</p>

	<p>used in accordance with the statutory or other authorities that govern their use; and</p> <p>Deliver value for money for the Exchequer as a whole.</p>	
	<p>The public body's annual accounts should be laid before Parliament. The Comptroller and Auditor General should be the external auditor for the body.</p>	<p>Comply - The Comptroller & Auditor General (C&AG) audits and signs off NFC's annual Report & Accounts, which together with the C&AG's report are laid before Parliament by the Secretary of State.</p>
<u>Ministerial Accountability</u>		
<u>Principle</u>	<p>The Minister is ultimately accountable to Parliament and the public for the overall performance of the public body.</p>	
Supporting provisions	<p>The Minister and sponsoring department should exercise appropriate scrutiny and oversight of the public body.</p>	<p>Comply - The Minister of State for Agriculture and Food is ultimately accountable to Parliament for the activities and performance of the NFC.</p> <p>The Board adheres to its 'Role and Responsibilities' and Directors comply with a code of conduct.</p>
	<p>Appointments to the board should be made in line with any statutory requirements and, where</p>	<p>All public appointments to the NFC which include the Chair are made within the requirements of the Code of</p>

	appropriate, with the <i>Code of Practice</i> issued by the Commissioner for Public Appointments.	Practice.
	The Minister will normally appoint the Chair and all non-executive board members of the public body and be able to remove individuals whose performance or conduct is unsatisfactory.	Comply -The Minister of State for Agriculture and Food is fully involved in the appointment of the Chair and of the Non-Executive Directors to the NFC Board.
	The Minister should be consulted on the appointment of the Chief Executive and will normally approve the terms and conditions of employment.	This is fully complied with -The Minister of State for Agriculture and Food is consulted on the appointment of the CEO of the NFC.
	The Minister should meet the Chair and/or Chief Executive on a regular basis.	Comply -The Minister of State for Agriculture and Food has an annual review with the Chair to discuss performance against a range of agreed objectives. The Minister, the Chair and the CEO meet on a regular basis.
	A range of appropriate controls and safeguards should be in place to ensure that the Minister is consulted on key issues and can be properly held to account. These will normally include: - a requirement for the public body to consult the	The Plan, agreed by the NFC Board, is developed in liaison with Defra, and submitted for the Minister of State for Food and Agriculture's approval, to a timetable agreed with the sponsorship team. The Business Plan sets out how the activities of NFC contribute to the delivery of Ministerial priorities (i)The NFC adheres to the Land Acquisition Policy (agreed with Defra which sets out the policy and procedure for the direct acquisition, management

	<p>Minister on the corporate and/or operational business plan;</p> <ul style="list-style-type: none"> - a requirement for the exercise of particular functions to be subject to guidance or approval from the Minister; - a general or specific power of Ministerial direction over the public body; - a requirement for the Minister to be consulted by the public body on key financial decisions. This should include proposals by the public body to: (i) acquire or dispose of land, property or other assets; (ii) form subsidiary companies or bodies corporate; and (iii) borrow money; and - a power to require the production of information from the public body which is needed to answer satisfactorily for the body's affairs. 	<p>and disposal of land. (ii) Defra is actively engaged in consideration of future governance options for the Forest and this is reflected in Chair's objectives for 13/14 agreed with Minister. (iii) Defra approval needed if NFC to borrow per para 6.45 of the Framework Document.</p>
	<p>There should be a requirement to inform Parliament of the activities of the public body through publication of an annual</p>	<p>Comply - The NFC publishes an annual report and accounts which is laid before Parliament</p>

	report.	
Roles and responsibilities		
<u>Roles of the Sponsoring Department</u>		
<u>Principles</u>	<p>The departmental board ensures that there are robust governance arrangements with the board of each arm's length body. These arrangements set out the terms of their relationship and explain how they will be put in place to promote high performance and safeguard propriety and regularity.</p> <p>There is a sponsor team within the department that provides appropriate oversight and scrutiny of, and support and assistance to, the public body.</p>	
Supporting provisions	<p>The departmental board's regular agenda should include scrutiny of the performance of the public body. The departmental board should establish appropriate systems and processes to ensure that there are effective arrangements in place for governance, risk management and internal control in the public body.</p>	<p>Comply - The NFC has not been selected by the Supervisory Board to provide quarterly performance reports but remains fully accountable to Defra Ministers and officials.</p> <p>The NFC framework document (published on their website) sets out detailed arrangements for governance, risk management and internal control.</p>

	<p>There should be a Framework Document in place which sets out clearly the aims, objectives and functions of the public body and the respective roles and responsibilities of the Minister, the sponsoring department and the public body. This should follow relevant Cabinet Office and HM Treasury guidance. The Framework Document should be published. It should be accessible and understood by the sponsoring department, all board members and by the senior management team in the public body. It should be regularly reviewed and updated.</p>	<p>Comply - A Framework Document is in place which complies with the guidance produced by the Cabinet Office and Treasury. This is reviewed and the last review took place in January-April 2012.</p> <p>As expected by the Public Bodies Reform Programme, the Framework Document provides the strategic context, purpose and legal framework, and acts as the overarching governance document for the NFC.</p>
	<p>There should be a dedicated sponsor team within the parent department. The role of the sponsor team should be clearly defined.</p>	<p>Comply - There is a Forestry Sponsorship team and their roles are clearly defined</p>
	<p>There should be regular and on-going dialogue between the sponsoring department and the public body. Senior officials from the sponsoring department may as appropriate attend board and/or committee meetings.</p>	<p>Comply - Senior officials are in frequent contact with the NFC. They also attend board meetings at least once a year.</p>
<p><u>Role of the Board</u></p>		

<u>Principles</u>	<p>The public body is led by an effective board which has collective responsibility for the overall performance and success of the body. The board provides strategic leadership, direction, support and guidance.</p> <p>The board – and its committees – have an appropriate balance of skills, experience, independence and knowledge.</p> <p>There is a clear division of roles and responsibilities between non-executive and executives. No one individual has unchallenged decision-making powers.</p>	
Supporting provisions	The board of the public body should: meet regularly; retain effective control over the body; and effectively monitor the senior management team	Comply -The Board held 4 main meetings in 2012-13.
	The size of the board should be appropriate	Comply - The board is made up of 6 Non-Executive members.
	Board members should be drawn from a wide range of diverse backgrounds	<p>Non-Executive Directors are recruited from a diverse range of backgrounds.</p> <p>Defra would like to see more local representation on the board.</p>
	The board should establish a framework of strategic control (or	Comply - Reflected in 'Role and Responsibilities' document which is given to all Directors on appointment

	<p>scheme of delegated or reserved powers). This should specify which matters are specifically reserved for the collective decision of the board. This framework must be understood by all board members and by the senior management team. It should be regularly reviewed and refreshed.</p>	<p>and which is periodically reviewed as part of Board effectiveness review.</p>
	<p>The Board should establish formal procedural and financial regulations to govern the conduct of its business.</p>	<p>Comply - Arrangements in place through delegations of authority, role of Audit & Risk Committee and accountabilities of executive to Board when presenting papers.</p>
	<p>The Board should establish appropriate arrangements to ensure that it has access to all such relevant information, advice and resources as is necessary to enable it to carry out its role effectively.</p>	<p>Comply - Board agendas, papers and deliberations are appropriate to fulfilling this requirement.</p>
	<p>The Board should make a senior executive responsible for ensuring that appropriate advice is given to it on all financial matters.</p>	<p>Comply - Head of Corporate Services (supported by Corporate & Strategic Advisor, a qualified accountant) is the Principle Finance Officer.</p>
	<p>The Board should make a senior executive responsible for ensuring that Board procedures are followed and that all</p>	<p>Comply - Head of Corporate Services fulfills Company Secretary role with CEO (and Corporate & Strategic Advisor)</p>

	applicable statutes and regulations and other relevant statements of best practice are complied with.	
	The Board should establish a remuneration committee to make recommendations on the remuneration of top executives. Information on senior salaries should be published. The board should ensure that the body's rules for recruitment and management of staff provide for appointment and advancement on merit.	The NFC Board agreed that it was not necessary to have a remuneration committee. The remuneration of staff below the level of CEO mirrors that of staff in core-Defra with the terms of the annual pay review negotiated for the Department being applied to NFC staff. The only discretionary payment made is the performance related non-consolidated bonus payable to CEO which can be up to 10% of salary. Because of the arrangements in place the NFC Board deemed it was not necessary to establish a Remuneration Committee.
	The Chief Executive should be accountable to the Board for the ultimate performance of the public body and for the implementation of the Board's policies. He or she should be responsible for the day-to-day management of the public body and should have line responsibility for all aspects of executive management.	Comply - The CEO is accountable to the Board for NFC performance against Business Plan priorities and outputs and this is reflected in her annual job plan.
	There should be an annual evaluation of the performance of the board and its committees – and of the Chair and individual board members.	Comply - The Chair has an annual appraisal with the Minister of State. The chair appraises the board members on a yearly basis.

<u>Role of the Chair</u>		
<u>Principles</u>	The Chair is responsible for leadership of the board and for ensuring its overall effectiveness.	Comply - The Chair of the NFC demonstrates effective leadership skills of the Board.
Supporting provisions	The board should be led by a non-executive Chair.	Comply -The NFC is led by a non-executive Chair.
	There should be a formal, rigorous and transparent process for the appointment of the Chair. This should be compliant with the <i>Code of Practice</i> issued by the Commissioner for Public Appointments. The Chair should have a clearly defined role in the appointment of non-executive board members.	Comply - The appointment of the current Chair was compliant with the Code of Practice. The Chair of the NFC is involved in the appointment of non-executive directors to the board.
	The duties, role and responsibilities, terms of office and remuneration of the Chair should be set out clearly and formally defined in writing. Terms and conditions must be in line with Cabinet Office guidance and with any statutory requirements. The responsibilities of the Chair will normally include: representing the public	Responsibilities of Chair set out in the Framework Document and the Code of Best Practice for NFC Directors'. .

	<p>body in discussions with Ministers;</p> <p>advising the sponsoring Department and Ministers about board appointments and the performance of individual non-executive board members;</p> <p>Ensuring that non-executive board members have a proper knowledge and understanding of their corporate role and responsibilities. The Chair should ensure that new members undergo a proper induction process and is normally responsible for undertaking an annual assessment of non-executive board members' performance;</p> <p>ensuring that the board, in reaching decisions, takes proper account of guidance provided by the sponsoring department or Ministers;</p> <p>ensuring that the board carries out its business efficiently and effectively;</p> <p>representing the views of the board to the general public; and</p>	
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	Developing an effective working relationship with the Chief Executive and other senior staff.	
	The roles of Chair and Chief Executive should be held by different individuals.	Comply - The Chair of the NFC is Catherine Graham-Harrison and the CEO is Sophie Churchill.
<u>Role of the Non-Executive Board Members</u>		
<u>Principle</u>	As part of their role, non-executive board members provide independent and constructive challenge.	
Supporting provisions	There should be a majority of non-executive members on the board.	Comply -The board is made up of 6 Non-Executive members with the CEO being the only executive director.
	There should be a formal, rigorous and transparent process for the appointment of non-executive members of the board. This should be compliant with the <i>Code of Practice</i> issued by the Commissioner for Public Appointments	Comply - Appointments are made in line with the Code of Practice for Ministerial Appointments issued by the Commissioner for Public Appointments.
	The duties, role and responsibilities, terms of office and remuneration of non-executive board	Comply - Role and responsibilities are set out in the Framework Document, Role & Responsibilities of NFC Directors and Code of Best Practice for

	<p>members should be set out clearly and formally defined in writing. Terms and conditions must be in line with Cabinet Office guidance and with any statutory requirements. The corporate responsibilities of non-executive board members (including the Chair) will normally include:</p> <ul style="list-style-type: none"> - establishing the strategic direction of the public body (within a policy and resources framework agreed with Ministers); - overseeing the development and implementation of strategies, plans and priorities; - overseeing the development and review of key performance targets, including financial targets; - ensuring that the public body complies with all statutory and administrative requirements on the use of public funds; - ensuring that the board operates within the limits of its statutory authority 	<p>NFC Directors documents.</p>
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	<p>and any delegated authority agreed with the sponsoring department;</p> <p>- ensuring that high standard of corporate governance is observed at all times. This should include ensuring that the public body operates in an open, accountable and responsive way; and</p> <p>- representing the board at meetings and events as required.</p>	
	All non –executive Board members must be properly independent of management	Comply - Non-executive Directors are independent of management.
	All non-executive board members must allocate sufficient time to the board to discharge their responsibilities effectively. Details of board attendance should be published (with an accompanying narrative as appropriate).	Comply - All non-executive board members allocate enough time to the NFC Board and this is part of the Board effective review.
	There should be a proper induction process for new board members. This should be led by the Chair. There should be regular reviews by the Chair of individual members' training and development needs.	Comply - Induction process in place for new directors. Includes meetings, key documentation and site visits. Checklist used. Training and development needs covered by performance reviews with Chair.

Effective Financial Management		
<u>Principle</u>	The public body has taken appropriate steps to ensure that effective systems of financial management and internal control are in place.	
Supporting Provisions		
<u>Annual Reporting</u>	The body must publish on a timely basis an objective, balanced and understandable annual report. The report must comply with HM Treasury guidance.	Comply -The NFC publishes an annual report which is compliant with the HM Treasury Guidance which is audited by NAO. This was laid on the 21 st May together with the Governance Statement.
<u>Internal Controls</u>	The public body must have taken steps to ensure that effective systems of risk management are established as part of the systems of internal control.	Comply - Effective system of risk management in place as confirmed by internal audit which gave a 'substantial' assurance re risk management arrangements.
	The public body must have taken steps to ensure that an effective internal audit function is established as part of the systems of internal control. This should operate to Government Internal Audit Standards and in accordance with Cabinet Office guidance.	Comply - Internal audit function provided by Mazars LLP which complies with Government Internal Audit Standards.

	<p>There must be appropriate financial delegations in place. These should be understood by the sponsoring department, by board members, by the senior management team and by relevant staff across the public body. Effective systems should be in place to ensure compliance with these delegations. These should be regularly reviewed.</p>	<p>Comply - Delegations from Defra to NFC as detailed in the Framework Document. Internally, NFC Board approves delegations to executive.</p>
	<p>There must be effective anti-fraud and anti-corruption measures in place.</p>	<p>Comply - Fraud policy in place.</p> <p>In 2012 all staff successfully completed the online course via CSL - 'Counter Fraud and Corruption'.</p>
	<p>There must be clear rules in place governing the claiming of expenses. These should be published. Effective systems should be in place to ensure compliance with these rules. The public body should proactively publish information on expenses claimed by board members and senior staff.</p>	<p>Comply - The NFC's Finance & Accounting Instructions cover arrangements for Directors and staff claiming expenses. These comply with Treasury principles and reflect, where appropriate, arrangements in place within core Defra.</p>
	<p>The annual report should include a statement on the effectiveness of the body's systems of internal control.</p>	<p>Comply - This is included in the Governance Statement which is included in Annual Reports and Accounts.</p>
<u>Audit Committee</u>	<p>The board should</p>	<p>Comply - The NFC maintains an Audit</p>

	establish an audit (or audit and risk) committee with responsibility for the independent review of the systems of internal control and of the external audit process.	and Risk Committee of its Board in accordance with the Cabinet Office's <i>Guidance on Code of Practice for Public Bodies</i> and the Audit Committee Handbook.
<u>External Auditors</u>	The body should have taken steps to ensure that an objective and professional relationship is maintained with the external auditors.	Comply - A good and professional relationship has developed with NAO personnel.
Communications		
<u>Principle</u>	The Public Body is open, transparent, accountable and responsive.	
Supporting Provisions		
<u>Communications with stakeholders</u>	The public body should have identified its key stakeholders. It should establish clear and effective channels of communication with these stakeholders.	Comply - Key stakeholders identified and programme of communication with each detailed in marketing and communications plan.
<u>Communication with the Public</u>	The public body should make an explicit commitment to openness in all its activities. It should engage and consult with the public on issues of real public interest or concern. This might be via new media. It should publish details of senior staff and boards members together with appropriate contact details.	Comply - NFC adopts an open approach with much information available on website. It consults as necessary and welcomes dialogue with the public.

	<p>The public body should consider holding open board meetings or an annual open meeting.</p>	<p>Comply - Minutes of board meetings are available on the website. The NFC engages with stakeholders through: regular specific working groups; larger scale events such as Forest Forums, which update a wide audience on progress and encourage engagement; local authority communications, and direct communications including a bi-annual newsletter, social media and the website.</p> <p>The Forest Forum events are not held every year, due to prioritising resources, but this will be reviewed by the NFC Board or its successor as a charitable NDPB.</p> <p>One open Board meeting has been held, attended by three people. There is nothing in principle to stop this in the future, with closed sessions for commercially or organisationally sensitive discussions. We are looking to improve transparency further and intend to provide more opportunities, on a formal and more regular basis, for the public to see how we operate and to liaise directly with the Board and senior employees.</p>
	<p>The public body should proactively publish agendas and minutes of board meetings.</p>	<p>Comply - Minutes of board meetings are available on the NFC website</p> <p>http://www.nationalforest.org/document/reports/</p>
	<p>The public body should proactively publish performance data.</p>	<p>Comply - Performance data contained in Business Plan, Annual Report and other research reports, available on</p>

		<p>website.</p> <p>http://www.nationalforest.org/document/reports/</p> <p>http://www.nationalforest.org/document/research/</p>
	<p>In accordance with transparency best practice, public bodies should consider publishing their spend data over £500. By regularly publishing such data and by opening their books for public scrutiny, public bodies can demonstrate their commitment to openness and transparency and to making themselves more accountable to the public.</p> <p>The public body should establish effective correspondence handling and complaint procedures. These should make it simple for members of the public to contact the public body and to make complaints. Complaints should be taken seriously. Where appropriate, complaints should be subject to investigation by the Parliamentary Ombudsman. The public body should monitor and report on its performance in handling correspondence.</p>	<p>Comply - Payments of over £25k are published via the website via links to Data.gov.uk http://www.nationalforest.org/about_us/pub/transparency.php</p> <p>The NFC does not hold a Government Procurement Card – where spend above £500 is reported.</p> <p>Complaint procedures are publicised on the website:</p> <p>http://www.nationalforest.org/about_us/pub/service.php</p> <p>Systems are in place to record, respond and monitor complaints. Complaints are reported upon in the Governance Statement contained within the Annual Report.</p>
<u>Marketing and PR</u>	The public body must comply with the	Comply - Marketing exemption forms are completed and authorised by the

	Government's conventions on publicity and advertising. These conventions must be understood by board members, senior managers and all staff in press, communication and marketing teams.	NFC CEO for all marketing and advertising spend below the value of £20k.
	Appropriate rules and restrictions must be in place limiting the use of marketing and PR consultants.	Comply - The NFC adhere to the advice and guidance when using marketing or PR Consultants.
	The public body should put robust and effective systems in place to ensure that the public body is not, and is not perceived to be, engaging in political lobbying. This includes restrictions on board members and staff attending Party Conferences in a professional capacity	Comply - All new directors and reappointed directors within their terms and conditions are reminded that in their role they should be seen to be politically impartial.
Conduct and Behaviour		
<u>Principle</u>	The board and the staff of the public body work to the highest personal standards. They promote the values of the public body and of good governance through their conduct and behaviour.	

Supporting Provisions		
<u>Conduct</u>	A Code of Conduct must be in place setting out the standards of personal and professional behaviour expected of all board members. This should follow the Cabinet Office Code. All members should be aware of the Code. The Code should form part of the terms and conditions of appointment.	Comply - A Code of Best Practice for new appointments to the board and reappointments to the board is available.
	<p>The public body has adopted a Code of Conduct for staff. This is based on the Cabinet Office model Code. All staff should be aware of the provisions of the Code.</p> <p>The Code should form part of the terms and conditions of employment.</p>	Comply – All staff aware of and expected to comply with this Code of Conduct
	There are clear rules and procedures in place for managing conflicts of interest. There is a publicly available Register of Interests for board members and senior staff. This is regularly updated.	<p>Comply - The Chair ensures that appropriate arrangements are put in place to record and manage conflicts and potential conflicts of interest of Board members.</p> <p>The NFC also complies at all times with the Code of Conduct adopted by NFC, and within Treasury and Cabinet Office rules relating to the use of public funds and to conflicts of interest.</p>

	<p>There are clear rules and guidelines in place on political activity for board members and staff. There are effective systems in place to ensure compliance with any restrictions.</p>	<p>Comply - In the terms and conditions that all new non-executive directors need to sign there is a section covering Political activity</p> <p>New appointments and reappointments to the NFC board also have to sign a Political Activity Questionnaire</p>
	<p>There are rules in place for board members and senior staff on the acceptance of appointments or employment after resignation or retirement. These are effectively enforced.</p>	<p>Comply - Board members need to clear with the Chair of the NFC, in advance, any appointment or employment taken up within two years of leaving the NFC where their official duties resulted in personal involvement with the company or other organisation making the offer, or to access to commercially sensitive information of the NFC or other organisation.</p>
<p><u>Leadership</u></p>	<p>Board members and senior staff should show leadership by conducting themselves in accordance with the highest standards of personal and professional behaviour and in line with the principles set out in respective Codes of Conduct.</p>	<p>Comply - Director/staff conduct monitored by NFC Chair/CEO.</p> <p>The Framework Document and Code of Conduct for Directors both state that Board Members must act in the public interest, and uphold at all times the seven principles of public life.</p>