

**PRINCIPLES OF GOOD CORPORATE GOVERNANCE**

**Accountability**

Statutory Accountability			Any other information
Principle	<i>The public body complies with all applicable statutes and regulations, and other relevant statements of best practice.</i>		
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.	√	Accounting and Financial directions are issued by DCMS for Lottery funds and Cabinet Office for Dormant Accounts funds and these are complied with. This is controlled by the Chief Executive, Finance Director and Deputy Director of Legal. Specific issues are dealt with in particular policy documents, most significantly the financial delegations and regulations, as well as others, e.g. recruitment of staff, procurement policies etc, assurance is provided by Internal Audit and National Audit Office audits.
	The public body must operate within the limits of its statutory authority and in accordance with any delegated authorities agreed with the sponsoring department.	√	The Fund is required under section 25B of the 1993 National Lottery (etc) Act to request consent from the Secretary of State at DCMS for any joint scheme. The requirement to notify any external delegation stems from section 25A of the Act and since the issue of the 2006 SFRs the Fund needs to notify the Secretary of State at DCMS if it makes any external delegations. It currently notifies both Cabinet Office and DCMS.
	The public body should operate in line with the statutory requirements and spirit of the Freedom of 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 Fund's policy on FOI is on the website: <a href="http://www.biglotteryfund.org.uk/about-big/customer-service/freedom-of-information">http://www.biglotteryfund.org.uk/about-big/customer-service/freedom-of-information</a> . Records are kept of requests received and responses issued. The Publications scheme is also available on the website and is up to date. The Senior Management Team have made a commitment to open data: <a href="http://www.biglotteryfund.org.uk/research/open-data">http://www.biglotteryfund.org.uk/research/open-data</a>
	The public body must be compliant with Data Protection legislation.	√	Information about the use of personal data is included within application forms and the terms and conditions of grant. The Fund's data protection policy can be found at: <a href="http://www.biglotteryfund.org.uk/about-big/customer-service/data-protection">http://www.biglotteryfund.org.uk/about-big/customer-service/data-protection</a>
	The public body should be subject to the Public Records Acts 1958 and 1967.	√	This legislation applies to the Fund and a retention scheme is in place and utilised.

Accountability for Public Money			Any other information
Principle	<i>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.</i>		
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).	√	Chief Executive appointed as Accounting Officer by Permanent Secretaries of DCMS and Cabinet Office; and in Management Statement and Financial Directions
	The role, responsibilities and accountability of the Accounting Officer should 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.	Action in progress	Dawn Austwick has met with DCMS Finance Director to discuss her responsibilities as accounting officer and is booked to attend training on 17 April 2014.
	The public body should establish appropriate arrangements to ensure that public funds: - are properly safeguarded; - used economically, efficiently and effectively; - used in accordance with the statutory or other authorities that govern their use; and - deliver value for money for the Exchequer as a whole.	√	Financial procedures and regular reporting to the Board.
	The public body's annual accounts should be laid before Parliament. The Comptroller and Auditor General should be the external auditor for the body.	√	The Annual Report and Accounts are laid before parliament annually. The Annual Report for 2012/13 was laid on 11 July 2013.

Ministerial Accountability			Any other information
Principle	<i>The Minister is ultimately accountable to Parliament and the public for the overall performance of the public body.</i>		
Supporting Provisions	The Minister and sponsoring department should exercise appropriate scrutiny and oversight of the public body.	√	Office for Civil Society (OCS) in Cabinet Office is in close contact with the Fund at a range of levels, and across the range of business. Ministers and senior officials meet frequently. The Sponsor has good level of oversight, including of Board papers and draft Annual Report and Accounts; OCS Director involved in appointments to England committee; performance management framework covering Policy Directions in place. Cabinet Office Permanent Secretary conducted Performance Appraisal of the Chair in November 2013. DCMS also maintains oversight of Big Lottery Fund's management and distribution of Lottery monies through a range of evidence gathering arrangements.
	Appointments to the board should be made in line with any statutory requirements and, where appropriate, with the Code of Practice issued by the Commissioner for Public Appointments.	√	OCS runs Board appointments in line with OCPA guidance and requirements of Schedule 4A to The National Lottery Act 1993 (as amended). Recent KPMG audit of Autumn 2012 appointments; no issues raised.
	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.	√	Minister for the Cabinet Office appoints Chair and all Board members; Terms and Conditions of appointment include power to remove individuals. Power also set out in management statement (3.3 and 3.5).
	The Minister should be consulted on the appointment of the Chief Executive and will normally approve the terms and conditions of employment	√	Cabinet Office is involved in the recruitment process, in liaison with DCMS (as department with Principal Accounting Officer responsibility). The DCMS Finance Director sat on appointment panel for recent CEO appointment. Ministers were consulted and the Minister for the Cabinet Office approved terms and conditions.
	The Minister should meet the Chair and/or Chief Executive on a regular basis.	√	Regular meetings between Minister for the Cabinet Office, Minister for Civil Society, Peter Ainsworth and/or Dawn Austwick. Minister for Cabinet Office attended Board meeting July 2013; Minister for Civil Society attended England Committee meeting November 2012.

	<p>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:</p> <p>(A)- a requirement for the public body to consult the Minister on the corporate and/or operational business plan;</p> <p>-(b) a requirement for the exercise of particular functions to be subject to guidance or approval from the Minister;</p> <p>-(C) a general or specific power of Ministerial direction over the public body;</p> <p>-(D) 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</p> <p>(E)- a power to require the production of information from the public body which is needed to answer satisfactorily for the body's affairs.</p> <p>(F)There should be a requirement to inform Parliament of the activities of the public body through publication of an annual report.</p>	Action in progress	<p>Legislation, Management Statement and Statements of Financial Requirements issued to the Fund by DCMS and Cabinet Office set out financial and administrative requirements with which the Fund must comply. General power of Ministerial Direction (C) is through Policy Directions. The key document relating to consultation with Minister on other elements is in the Management Statement. The DCMS/Cabinet Office Memorandum of Understanding is currently under review; Management Statement will also be revised in the light of changes to that and at this point revisions will be included to make the requirement for consultation on elements A, B, D and E clearer.</p>
	<p>There should be a requirement to inform Parliament of the activities of the public body through publication of an annual report.</p>	√	<p>Required under S.34 of The National Lottery etc Act 1993, as amended, and reflected in Management Statement.</p>

**PRINCIPLES OF GOOD CORPORATE GOVERNANCE**

**Roles and responsibilities**

<b>Role of the Sponsoring Department</b>			<b>Any other information</b>
<i>Principle</i>	<i>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. There is a sponsor team within the department that provides appropriate oversight and scrutiny of, and support and assistance to, the public body.</i>		
Supporting Provisions	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.	√	DCMS conducts an annual review of all Lottery Distributors to gain assurances that their systems of internal control are satisfactory across the range of governance, risk management, fraud detection and other areas. The report is considered by DCMS Audit and Risk Committee which in turn reports to the DCMS Board. Assurances about Cabinet Office's own sponsorship oversight of the Big Lottery Fund (BLF) have also been garnered as part of DCMS's risk management processes. In addition, Cabinet Office Board took a paper on BLF in October 2013.
	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.	√	The Management Statement fulfils this requirement. The Management Statement was brought to attention of Board and SMT when issued and is published on Big Lottery Fund website. The DCMS/CO Memorandum of Understanding is currently being reviewed.
	There should be a dedicated sponsor team within the parent department. The role of the sponsor team should be clearly defined.	√	Dedicated resource within OCS (approx 0.8 FTE Band A, 0.1 FTE SCS1), who liaise with DCMS as appropriate. Role of sponsor team (and role of DCMS) defined in Memorandum of Understanding.
	There should be regular and ongoing dialogue between the sponsoring department and the public body. Senior officials from the sponsoring department may as appropriate attend board and/or committee meetings. There might also be regular meetings between relevant professionals in the sponsoring department and the public body.	√	Regular meetings between sponsor official and lead officer in BLF; frequent contact with other BLF individuals as appropriate. Senior Staff and staff from elsewhere in Cabinet Office also engage as appropriate. Secondments between BLF and Cabinet office and vice versa are arranged as appropriate. Regular tripartite meetings between DCMS, Cabinet Office and BLF have also recently been put in place.

Role of the Board		Any other information	
<i>Principle</i>	<p><i>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.</i></p> <p><i>The board – and its committees – have an appropriate balance of skills, experience, independence and knowledge.</i></p> <p><i>There is a clear division of roles and responsibilities between non-executive and executives. No one individual has unchallenged decision-making powers.</i></p>		
Supporting Provisions	<p>The board of the public body should:</p> <ul style="list-style-type: none"> <li>- meet regularly;</li> <li>- retain effective control over the body; and</li> <li>- effectively monitor the senior management team.</li> </ul>	√	Roles set out in Management Statement and terms of reference. Board meet quarterly as agreed by Minister . <a href="http://bigonline/about-us/board,-committees-and-governance/agendas,-minutes-and-papers/">http://bigonline/about-us/board,-committees-and-governance/agendas,-minutes-and-papers/</a>
	The size of the board should be appropriate.	√	Size of Board defined in Schedule 4A to National Lottery etc Act 1993, as amended (9 - 12 members).
	Board members should be drawn from a wide range of diverse backgrounds.	√	Particular care given to ensuring private sector and VCSE sectors are represented. Diversity of Board (gender balance, ethnic balance, geographical spread, etc) kept under review. Range of recruitment vehicles used to ensure widest possible diversity.
	The board should establish a framework of strategic control (or 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.	√	Delegated decision making in place and remit between Board and executives are in place . Scheme for financial delegation; delegated decision making. Terms of Reference, reviewed in 2010 as part of governance review and agreed with the Cabinet Office.
	The Board should establish formal procedural and financial regulations to govern the conduct of its business.	√	Terms of Reference and Funding Development Framework.
	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.	√	Role of SMT - regular liasion with Chair and CEO

	The Board should make a senior executive responsible for ensuring that Board procedures are followed and that all applicable statutes and regulations and other relevant statements of best practice are complied with.	√	CEO supported by Directors of Finance and Corporate Services Directorate of Strategy, Performance and Learning.
	The Board should make a senior executive responsible for ensuring that appropriate advice is given to it on all financial matters.	√	CEO supported by Director of Finance and Corporate Services Directorate and Audit and Risk Committee
	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.	√	Information published in Annual report on remuneration. Committee meets once a year. The Fund has a clear equal opportunity policy.
	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.	√	Job Description of CEO, Terms of Reference,
	There should be an annual evaluation of the performance of the board and its committees – and of the Chair and individual board members.	√	Formal appraisals are in place once a year. The Chair appraises all Board members including Committee Chairs on their performance and that of their area of responsibility. Cabinet Office appraises the Chair.
<b>Role of the Chair</b>			Any other information
<i>Principle</i>	<i>The Chair is responsible for leadership of the board and for ensuring its overall effectiveness.</i>		
Supporting Provisions	The board should be led by a non-executive Chair.	√	Peter Ainsworth - Job description and Terms of Appointment
	There should be a formal, rigorous and transparent process for the appointment of the Chair. This should be compliant with the Code of Practice issued by the Commissioner for Public Appointments. The Chair should have a clearly defined role in the appointment of non-executive board members.	√	Chair appointed in line with OCPA Code of Practice. Recent KPMG audit of Autumn 2012 appointments; no issues raised. Chair has a seat at the recruitment panel for other Board members.

	<p>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:</p> <ul style="list-style-type: none"> <li>- representing the public body in discussions with Ministers;</li> <li>- advising the sponsoring Department and Ministers about board appointments and the performance of individual non-executive board members;</li> <li>- 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;</li> <li>- ensuring that the board, in reaching decisions, takes proper account of guidance provided by the sponsoring department or Ministers;</li> <li>- ensuring that the board carries out its business efficiently and effectively;</li> <li>- representing the views of the board to the general public; and</li> <li>- developing an effective working relationship with the Chief Executive and other senior staff.</li> </ul>	√	Covered by letter of appointment and Job Description of Chair, and Section 8 of Management Statement. Remuneration in line with BLF Remuneration Policy (as agreed by Minister for the Cabinet Office) and subsequent Ministerial correspondence.
	The roles of Chair and Chief Executive should be held by different individuals.	√	Dawn Austwick and Peter Ainsworth
<b>Role of Non-Executive Board Members</b>			Any other information
<i>Principle</i>	<i>As part of their role, non-executive board members provide independent and constructive challenge.</i>		
Supporting Provisions	There should be a majority of non-executive members on the board.	√	All non -executives



	<p>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 Code of Practice issued by the Commissioner for Public Appointments</p>	√	<p>Process is compliant with OCPA Code of Practice. Recent KPMG audit of Autumn 2012 appointments; no issues raised.</p>
	<p>The duties, role and responsibilities, terms of office and remuneration of non-executive board 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"> <li>- establishing the strategic direction of the public body (within a policy and resources framework agreed with Ministers);</li> <li>- overseeing the development and implementation of strategies, plans and priorities;</li> <li>- overseeing the development and review of key performance targets, including financial targets;</li> <li>- ensuring that the public body complies with all statutory and administrative requirements on the use of public funds;</li> <li>- ensuring that the board operates within the limits of its statutory authority and any delegated authority agreed with the sponsoring department;</li> <li>- ensuring that high standard of corporate governance are observed at all times. This should include ensuring that the public body operates in an open, accountable and responsive way; and</li> <li>- representing the board at meetings and events as required.</li> </ul>	√	<p>Covered by letter of appointment and Job Description of Board members, and Section 9 of Management Statement. Remuneration in line with BLF Remuneration Policy (as agreed by Minister for the Cabinet Office)</p>
	<p>All non-executive Board members must be properly independent of management.</p>	√	<p>This is the way the Board and Committees are run</p>

	<p>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).</p>	√	Reported in Annual reports;e.g. page 89 of 2013 report.
	<p>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.</p>	√	Induction arrangements in place and annual reviews of Board members by Chair.

**PRINCIPLES OF GOOD CORPORATE GOVERNANCE**  
**Effective financial management**

Effective financial management			Any other information
Principle	<i>The public body has taken appropriate steps to ensure that effective systems of financial management and internal control are in place.</i>		
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.	√	Published Annual reports, laid before Parliaments as required by legislation.
<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.	Action in progress	The Audit and risk committee meet regularly. Limited assurance in terms of risk processes was provided by the Head of Internal Audit at the end of 12/13 and therefore the Fund's risk process is currently being reviewed.
	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.	√	Reports to Audit and Risk Committee and Board. Internal Audit annual plan.
	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.	√	Financial Delegations report to the Board in 2012; sections regularly reviewed - e.g. banking delegations section updated by Chairs Action November 2013.
	There must be effective anti-fraud and anti-corruption measures in place.	√	A Fraud Strategy is in place and is under review. Audit arrangements are in place.

	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.	√	Clear instructions are provided to all staff and approval processes are in place. Publication on intranet of board and senior staff expenses: <a href="http://www.biglotteryfund.org.uk/about-big/our-people/board/board-committee-and-smt-expenses">http://www.biglotteryfund.org.uk/about-big/our-people/board/board-committee-and-smt-expenses</a>
	The annual report should include a statement on the effectiveness of the body's systems of internal control.	√	Page 75 of 2013 Annual report
<u>Audit Committee</u>	The board should 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.	√	Audit and risk committee in place, Chaired by Tony Burton, Board member.
<u>External Auditors</u>	The body should have taken steps to ensure that an objective and professional relationship is maintained with the external auditors.	√	This is maintained through Financial and Corporate Services Directorate and the Audit and Risk Committee.

**PRINCIPLES OF GOOD CORPORATE GOVERNANCE**

**Communications**

<b>Communications</b>			Any other information
<i>Principle</i>	<i>The Public Body is open, transparent, accountable and responsive.</i>		
Supporting Provisions			
<u>Comms with Stakeholders</u>	The public body should have identified its key stakeholders. It should establish clear and effective channels of communication with these stakeholders.	√	A Stakeholder database is held and a VCS stakeholder survey was conducted in 2013. The Stakeholder engagement plan will be reviewed at the January 2014 Board meeting.
<u>Comms 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.	Action in progress	A list of Board members is included here: <a href="http://www.biglotteryfund.org.uk/about-big/our-people/board">http://www.biglotteryfund.org.uk/about-big/our-people/board</a> . Contact point details are being updated.
	The public body should consider holding open board meetings or an annual open meeting.	√	There have been previous open Board meetings. There are no currently planned open meetings, but the Strategy Unit considering as part of Framework consultation in 2014. Subject to SMT and Board agreement
	The public body should proactively publish agendas and minutes of board meetings.	√	<a href="http://www.biglotteryfund.org.uk/about-big/our-people/board/board-meeting-minutes">Agendas and minutes are published on the Fund's website: http://www.biglotteryfund.org.uk/about-big/our-people/board/board-meeting-minutes</a>
	The public body should proactively publish performance data.	√	Published corporate plan and report in Annual report and accounts.

	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.	Explain	Spend above £25k published but not less. The resources are not in place to publish all transactions over £500 at present. See Transparency section on internet: <a href="http://www.biglotteryfund.org.uk/about-big/customer-service/freedom-of-information">http://www.biglotteryfund.org.uk/about-big/customer-service/freedom-of-information</a> . BLF, in common with all Lottery distributors, is required to report all Lottery grants, regardless of size, to DCMS who in turn publishes the data on the National Lottery Grants Database. The Database is publicly accessible and searchable by distributor.
	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.	Action in progress	This process is the same for all Lottery distributors and volumes and outcomes of complaints are monitored. This performance information is not presently published, but there are plans in place to do so in the Annual Report 2013/14. Information about making a complaint can be found at: <a href="http://www.biglotteryfund.org.uk/about-big/customer-service/making-a-complaint">http://www.biglotteryfund.org.uk/about-big/customer-service/making-a-complaint</a>
<u>Marketing and PR</u>	The public body must comply with 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.	√	Communication activity is driven by the need to raise awareness of funding programmes and to generate sufficient good quality applications. Further communication activity seeks to raise awareness of where lottery money goes and the difference it makes to local communities. The Fund does not use PR agencies. A note summarising Government Spending Controls on the Fund and how they apply was circulated by the Finance Director in June 2011.
	Appropriate rules and restrictions must be in place limiting the use of marketing and PR consultants.	√	Guidance is in place on what Fund will and will not do regarding publicity, public affairs and communication spend. This guidance was agreed with DCMS as the Fund's then sponsor Department.

	<p>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.</p>	√	<p>Board member appointment Terms &amp; Conditions point to requirement to follow Cabinet Office Code of conduct, which makes specific reference to party conferences – new members are provided with this on appointment and asked to sign/confirm understanding of conditions. Code of ethics, including political activity restrictions apply to staff. Staff do not attend Party Conferences in professional capacity.</p>
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**PRINCIPLES OF GOOD CORPORATE GOVERNANCE**

**Conduct and behaviour**

Conduct and behaviour			Any other information
<i>Principle</i>	<i>The board and staff of the public body work to the highest personal and professional standards. They promote the values of the public body and of good governance through their conduct and behaviour.</i>		
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.	√	Code forms part of conditions of appointment.
	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. The Code should form part of the terms and conditions of employment.	√	Code of ethics in place.
	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.	√	Register of Interest for Board and Committee members in Annual Report (Pages 80 - 85) 2013. It is regularly updated and any conflicts asked for and noted in minutes at any relevant decision making Committee. Staff members conflicts of interests recorded internally and noted for any relevant decision making Committee in minutes.
	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.	√	Code forms part of conditions of appointment for Board members. Code of ethics in place for staff.



	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.	Partly met - new staff only. Action in progress	For new senior staff (Directors and CEO) rules are included in appointment terms and can be enforced. Board members' appointment terms do not currently include restrictions and this will be remedied going forward.
<u>Leadership</u>	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.	Action	Board members and Senior Staff are required to conduct themselves with the highest standards of professional behaviour, as laid out in their terms and conditions and the Fund's Code of Ethics. The staff survey in 2012 indicated that senior leadership was an area for improvement and this is being actively addressed.