



Ministry
of Defence

Ministry of Defence Police Committee -Independent Members-

Code of Conduct

(including the register of interests)

Author:	Clerk to the MOD Police Committee
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CODE OF CONDUCT

Scope

1. A member must observe the Police Committee's Code of Conduct whenever they conduct business on behalf of the Committee or act as a representative of the Committee.

Conduct and the Seven Principles of Public Life

2. Attention is drawn to the conduct expected under the Seven Principles of Public Life and in the Civil Service Code. A member is expected to adhere to the principles of these even though they are not formally designated as a Civil Servant.

3. The Seven Principles of Public Life is provided at Annex A and the Civil Service Code is at Annex B

Confidentiality of information

4. The Official Secrets Act 1989 will apply to independent members of the MOD Police Committee and will continue to apply after their appointments have ended. Members are asked to sign a declaration under the Official Secrets Act, if they have not already done so.

5. In addition, members will be under a duty to keep confidential and not use, except for the purposes of this agreement, any information from any source, acquired by them in confidence.

6. A basic guide to the Official Secrets Act 1989 including a declaration is provided at Annex C

Register of Members' interests

7. It is a condition of this appointment that members must not be able to profit personally or corporately, or to derive benefit for other employers or the like, from information revealed or deduced during Police Committee business. Therefore independent members will be expected to respect the confidentiality of any matters discussed at meetings or during visits. Where it becomes apparent that a discussion could lead to a situation where a conflict of interest could arise, you should declare an interest to the Chair or the Clerk of the Committee.

8. Independent members should declare any conflict of interest, or any matter which could lead to embarrassment being caused to the MOD Police Committee Ministry of Defence, or any other Government Department. Chair will ask for any declarations of interest at the beginning of each Committee meeting and the response will be written in the minutes.

9. Members should declare any personal or business interest which may, or may be perceived (by a reasonable member of the public) to influence their judgement. This should include, as a minimum, personal direct or indirect pecuniary interests. Members should normally also include such interests of close family members and of people living in your household.

10. This declaration will be copied to the Clerk of the MOD Police Committee, who is required to keep a central Register of Interests. The declarations should be kept up to date and regularly reviewed therefore a quarterly check will be conducted by the Clerk. Members are also asked to declare if they have no such interests. The returns will be published on the MOD Police Committee web page. The Chair may determine that a member who has declared a particular interest should be excluded from discussion or voting in connection with any matter of Committee business where that interest may be engaged.

11. Members are also expected to inform the Clerk in advance of any new appointments which may impinge upon their duties as independent member of the MOD Police Committee. The Clerk will advise the Chair/senior officials/Ministers as required.

Political Activity

12. Members are not expected to occupy paid party political posts or hold a particularly sensitive or high role in a political party. Subject to the foregoing, members are free to engage in political activities, provided that they are conscious of their general public responsibilities and exercise a proper discretion, particularly with regard to the work of the MOD.

13. You are expected to inform the Clerk to the MOD Police Committee of any intention to accept a prominent position to any political party who will inform the Secretary of State. You should understand that your appointment to the MOD Police Committee may be terminated if it is felt that the positions are incompatible.

14. If a member accepts a nomination for election to an elected government assembly, they will be required to resign from this appointment.

Fees and Expenditure

15. Visits, tasks or ad-hoc projects which incur fees within the terms of this arrangement need to be agreed with the Clerk to the Police Committee. Members should not assume that any other proposal for work arising from another person in MOD or MDP constitutes a commitment without getting approval from the Clerk in advance.

16. Members may claim for reasonable standard class travel and other related expenses which are incurred in accordance with MOD policy, which require the production of receipts.

17. Details of each member's fees and remuneration will be disclosed in the MOD Police Committee Annual Report to Defence Ministers, which is placed in the public domain.

Gifts and Hospitality

18. The Clerk to the MOD Police Committee is expected to ensure that the acceptance of gifts and hospitality by independent members can stand up to public scrutiny.

19. Gifts should be declined wherever possible. Similarly, care should be taken that no extravagance is involved with working lunches and other social occasions.

20. Where it would be ungracious or otherwise difficult not to accept a gift or hospitality, the independent member must where the value is over £50, provide written notification within 28 days to the Clerk of the Police Committee of the existence and nature of that gift or hospitality, the estimated value and the donor. The Clerk will record this in the Gifts and Hospitality Register, which will be published on the MOD Police Committee webpage and updated each quarter.

Complaints or Allegations about Members

21. Any complaint or allegation that an independent member has breached the provisions of this code of conduct or has behaved in a manner that could bring the MOD or MOD Police into disrepute should be reported to the Clerk to the Committee who will investigate the matter in consultation with the Chair (except that if the complaint or allegation relates to the Chair, the Clerk will act in consultation with the DG HOCS MOD)


Annexes:

- A. The Seven Principles of Public Life
- B. The Civil Service Code
- C. Basic Guide to the Official Secrets Act 1989

Register of disclosable interests

Name: ...Sir Hugh Orde.....

I am employed as Consultant
I carry on business as Hugh Orde Ltd
My employer is Self employed through Company
I am a partner in the following firm(s) None
Details of any body of which you are a member or in a position of general control or management (i) None (ii) Chair of Police Memorial Arboretum Trust (iii) None
The following person(s) have made payments or provided other financial benefits to me in respect of expenses incurred by me in carrying out my duties: None
I am the director of: i) Hugh Orde Ltd ii) iii) iv) President of Police Mutual Assurance Society
Please provide details of any other relevant interests, including significant interests of close family members None

Signed		Dated	29 th June 2015
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Received by:

Signed		Dated	
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Register of disclosable interests

Name:Moi Ali.....


I am employed as a self-employed consultant, writer and landlord (residential letting and holiday lets)
I carry on business as above
My employer is Self-employed
I am a partner in the following firm(s) N/A
Details of any body of which you are a member or in a position of general control or management (i) exercising functions of a public nature (ii) directed to charitable purposes (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union) Non executive director of: Scottish Ambulance Service; Education Scotland; Professional Standards Authority for Health and Care.
The following person(s) have made payments or provided other financial benefits to me in respect of expenses incurred by me in carrying out my duties: Scottish Ambulance Service; Education Scotland; Professional Standards Authority for Health and Care.
I am a non-executive director of: Scottish Ambulance Service Endowment Fund i) any company ii) any industrial or provident society iii) any charity iv) or other body
Please provide details of any other relevant interests, including

significant interests of close family members

None

Signed		Dated	12/10/17
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Received by:

Signed		Dated	14/16/17
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Register of disclosable interests

Name: ...**Anne McMeel**.....

I am employed as a non-executive at the MoD, Crossrail (from 1 July 2018) and Transport for London
I carry on business as N/A
My employer is MoD, Crossrail and Transport for London
I am a partner in the following firm(s)
Details of any body of which you are a member or in a position of general control or management (i) exercising functions of a public nature (ii) directed to charitable purposes (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)
The following person(s) have made payments or provided other financial benefits to me in respect of expenses incurred by me in carrying out my duties: MoD, Crossrail and Transport for London
I am the director of: i) any company ii) any industrial or provident society iii) any charity iv) or other body
Please provide details of any other relevant interests, including significant interests of close family members On a nonremunerated basis I have been an independent member of the Arts Council England Performance and Audit Committee since March 2016, I have resigned this position with effect from 30 June 2018

Signed	<i>Amen Mcneel</i>	Dated	<i>9 June 2018</i>
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Received by:

Signed	<i>K FEATHER</i>	Dated	<i>12 June 2018.</i>
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Register of disclosable interests

Name: **Sir Brian Burridge**

I am employed as The Chair of the MOD Police Committee
I carry on business as An interim executive and management consultant
My employer is The Ministry of Defence & The Royal Aeronautical Society
I am a partner in the following firm(s) Icarus Consulting Services Limited
Details of any body of which you are a member or in a position of general control or management (i) exercising functions of a public nature (ii) directed to charitable purposes (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union) Managing Director of Icarus Consulting Services Limited CEO of the Royal Aeronautical Society Director of Aerosociety Trading Limited

The following person(s) have made payments or provided other financial benefits to me in respect of expenses incurred by me in carrying out my duties: Clients of Icarus Consulting Services: <ul style="list-style-type: none">• ADS Group Ltd as the controlling legal entity of the UK Defence Solutions Centre• McKinsey & Company• Royal Dutch Shell plc• GLG Group And <ul style="list-style-type: none">• The Royal Aeronautical Society
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I am the director of:

- i) any company
- ii) any industrial or provident society
- iii) any charity
- iv) or other body

**Managing Director of Icarus Consulting Services Limited
Director Aerosociety Trading Limited**

Please provide details of any other relevant interests, including significant interests of close family members

None

Signed		Dated	29 Oct 18
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Received by:


Signed	K Feather	Dated	30 Oct 18
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Register of disclosable interests


Name:Mike Franklin.....

I am employed as Non Executive Director, South London and Maudsley NHS Foundation Trust and Independent Member, MoD Police Committee
I carry on business as N/A
My employer is MoD, South London and Maudsley NHS Foundation Trust
I am a partner in the following firm(s) None
Details of any body of which you are a member or in a position of general control or management (i) exercising functions of a public nature (ii) directed to charitable purposes (iii) one of who principle purposes includes the influence of public opinion or policy (including any political party or trade union) Board Member, South London and Maudsley NHS Foundation Trust
The following person(s) have made payments or provided other financial benefits to me in respect of expenses incurred by me in carrying out my duties: MoD, South London and Maudsley NHS Foundation Trust
I am the director of: N/A i) any company ii) any industrial or provident society iii) any charity iv) or other body v)
Please provide details of any other relevant interests, including significant interests of close family members

None

Signed	Mike Franklin 	Dated	11th Sept 2018
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Received by:

Signed		Dated	12 Sep 18
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