

Part 5

Section 5.1 – Members’ Code of Conduct

This Code applies to Combined Authority Members and voting Co-opted Members¹ (together referred to as Members), in all aspects of public life.

The Combined Authority expects Members to follow this Code when:

- conducting the work of the Combined Authority,
- representing the Combined Authority on any external organisation, and
- otherwise acting in their official capacity.

The Code does not apply to purely private and personal life.

General principles of conduct

1. Everyone in public office at all levels, all who serve the public or deliver public services, including ministers, civil servants, Members and Combined Authority officers should uphold the Seven Principles of Public Life, also known as the Nolan Principles - see further Annex 1.
2. In accordance with the public trust placed in me, on all occasions:
 - I act with integrity and honesty,
 - I act lawfully,
 - I treat all persons fairly and with respect, and
 - I lead by example and act in a way that secures public confidence in my role as a Member.
3. In undertaking my role:
 - I impartially exercise my responsibilities in the interests of the local community,
 - I do not improperly seek to confer an advantage or disadvantage on any person,
 - I avoid conflicts of interest,

¹ A voting co-opted member of the Combined Authority is a person who is not a Member of the Combined Authority, but who is:

- a member of any committee or sub-committee of the Combined Authority, or
- a member of, and represents the authority on, any joint committee or joint sub-committee of the Combined Authority and who is entitled to vote on any question that falls to be decided at any meeting of that committee or sub-committee.

This includes any voting private sector representative.

The Code also applies to any Substitute Member of a Combined Authority Member or voting Co-opted Member.

- I exercise reasonable care and diligence, and
- I ensure that public resources are used prudently in accordance with the Combined Authority's requirements and in the public interest.

Application of the Code of Conduct

4. This Code of Conduct applies to you as soon as you are appointed as a Member². It continues to apply to you until you cease to be a Member.
5. This Code of Conduct applies to you when you are acting in your capacity as a Member which may include when:
 - you misuse your position as a Member,
 - your actions would give the impression to a reasonable member of the public with knowledge of all the facts that you are acting as a Member.
6. The Code applies to all forms of communication and interaction, including:
 - at face-to-face meetings,
 - at online or telephone meetings,
 - in written communication,
 - in verbal communication,
 - in non-verbal communication,
 - in electronic and social media communication, posts, statements and comments.
7. You are also expected to uphold high standards of conduct and show leadership at all times when acting in your official capacity.
8. Your Monitoring Officer has statutory responsibility for the implementation of the Code of Conduct, and you are encouraged to seek advice from your Monitoring Officer on any matters that may relate to the Code of Conduct.

Standards of Conduct

9. This section sets out your obligations, which are the minimum standards of conduct required of you. Should your conduct fall short of these standards, a complaint may be made against you, which may result in action being taken.
10. Guidance is included (in the footnotes) to help explain the reasons for the obligations and how they should be followed.

Respect³

² For the Mayor, the Code applies as soon as you are in office.

³ Respect means politeness and courtesy in behaviour, speech, and in the written word. Debate and having different views are all part of a healthy democracy. You can express, challenge, criticise and

11. As a Member:
- **I treat other Members and members of the public with respect.**
 - **I treat Combined Authority officers and representatives of partner organisations with respect and respect the role they play.**

Bullying, harassment and discrimination⁴

12. As a Member:
- **I do not bully**⁵ **any person.**
 - **I do not harass**⁶ **any person.**
 - **I promote equalities**⁷ **and do not discriminate unlawfully**⁸ **against any person.**

Impartiality of officers⁹

disagree with views, ideas, opinions and policies in a robust but civil manner. You should not, however, subject individuals, groups of people or organisations to personal attack. In your contact with the public, you should treat them politely and courteously. Rude and offensive behaviour lowers the public's expectations and confidence in Members in general and may amount to bullying or harassment. In return, you have a right to expect respectful behaviour from the public. If members of the public are being abusive, intimidatory or threatening you are entitled to stop any conversation or interaction in person or online and report them to the Combined Authority, the relevant social media provider or the police. This also applies to fellow Members, where action could then be taken under the Members' Code of Conduct, and Combined Authority officers, where concerns should be raised in line with the Combined Authority's Officers' Code of Conduct or any relevant Protocol.

⁴ You should not bully or harass any person working for the Combined Authority or otherwise coming into contact with it.

⁵ The Advisory, Conciliation and Arbitration Service (ACAS) characterises bullying as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying might be a regular pattern of behaviour or a one-off incident, happen face-to-face, on social media, in emails or phone calls, happen in the workplace or at work social events and may not always be obvious or noticed by others.

⁶ The Protection from Harassment Act 1997 defines harassment as conduct that causes alarm or distress or puts people in fear of violence and must involve such conduct on at least two occasions. It can include repeated attempts to impose unwanted communications and contact upon a person in a manner that could be expected to cause distress or fear in any reasonable person.

⁷ The Equality Act 2010 places specific duties on local authorities, including combined authorities. Members have a central role to play in ensuring that equality issues are integral to the Combined Authority's performance and strategic aims, and that there is a strong vision and public commitment to equality across public services.

⁸ Unlawful discrimination is where someone is treated unfairly because of a protected characteristic. Protected characteristics are specific aspects of a person's identity defined by the Equality Act 2010. They are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

⁹ Officers work for the Combined Authority as a whole and must be politically neutral. They should not be coerced or persuaded to act in a way that would undermine their neutrality. You can question officers in order to understand, for example, their reasons for proposing to act in a particular way, or the content of a report that they have written. However, you must not try and force them to act differently, change their advice, or alter the content of that report, if doing so would prejudice their professional integrity.

13. As a Member:
- **I do not compromise, or attempt to compromise, the impartiality of anyone who works for, or on behalf of, the Combined Authority.**

Confidentiality and access to information¹⁰

14. As a Member:
- **I do not disclose information:**
 - a. **given to me in confidence by anyone,**
 - b. **acquired by me which I believe, or ought reasonably to be aware, is of a confidential nature, unless:**
 - i. **I have received the consent of a person authorised to give it,**
 - ii. **I am required by law to do so,**
 - iii. **the disclosure is made to a third party for the purpose of obtaining professional legal advice provided that the third party agrees not to disclose the information to any other person, or**
 - iv. **the disclosure is:**
 - **reasonable and in the public interest, and**
 - **made in good faith and in compliance with the reasonable requirements of the Combined Authority, and**
 - **I have consulted the Monitoring Officer prior to its release.**
 - **I do not improperly use knowledge gained solely as a result of my role as a Member for the advancement of myself, my friends, my family members, my employer or my business interests.**
 - **I do not prevent anyone from getting information that they are entitled to by law.**

Disrepute¹¹

¹⁰ Combined authorities must work openly and transparently, and their proceedings and printed materials are open to the public, except in certain legally defined circumstances. You should work on this basis, but there will be times when it is required by law that discussions, documents and other information relating to or held by the Combined Authority must be treated in a confidential manner. Examples include personal data relating to individuals or information relating to ongoing negotiations.

¹¹ As a Member, you are trusted to make decisions on behalf of your community and your actions and behaviour are subject to greater scrutiny than that of ordinary members of the public. You should be aware that your actions might have an adverse impact on you, other Members and/or the Combined Authority and may lower the public's confidence in you or the Combined Authority's ability to discharge your/its functions. For example, behaviour that is considered dishonest and/or deceitful can bring the Combined Authority into disrepute.

You are able to hold the Combined Authority and fellow Members to account and are able to constructively challenge and express concern about decisions and processes undertaken by the Combined Authority whilst continuing to adhere to other aspects of this Code of Conduct.

15. As a Member:
- **I do not bring my role or the Combined Authority into disrepute.**

*Use of position*¹²

16. As a Member:
- **I do not use, or attempt to use, my position improperly to the advantage or disadvantage of myself or anyone else.**

*Use of Combined Authority resources and facilities*¹³

17. As a Member:
- **I do not misuse Combined Authority resources.**
 - **I will, when using the resources of the Combined Authority, or authorising their use by others:**
 - a. **act in accordance with the Combined Authority's requirements, and**
 - b. **ensure that such resources are not used for political purposes unless that use could reasonably be regarded as likely to facilitate, or be conducive to, the discharge of the functions of the Combined Authority or of the office to which I have been elected or appointed.**

*Complying with the Code of Conduct*¹⁴

18. As a Member:
- **I undertake Code of Conduct training provided by the Combined Authority.**
 - **I cooperate with any Code of Conduct investigation and/or determination.**

¹² Your position as a Member provides you with certain opportunities, responsibilities, and privileges, and you make choices all the time that will impact others. However, you should not take advantage of these opportunities to further your own or others' private interests or to disadvantage anyone unfairly.

¹³ You may be provided with resources and facilities by the Combined Authority to assist you in carrying out your duties. Examples include office support, stationery, equipment such as phones and computers, transport, access and use of Combined Authority buildings and rooms. These are given to you to help you carry out your role as a Member more effectively and are not to be used for business or personal gain. They should be used in accordance with the purpose for which they have been provided and the Combined Authority's own policies regarding their use.

¹⁴ It is extremely important for you as a Member to demonstrate high standards, for you to have your actions open to scrutiny and for you not to undermine public trust in the Combined Authority or its governance.

All complaints alleging a failure to comply with this Code will be considered under the Procedure for dealing with Complaints agreed by the Combined Authority. If you do not understand or are concerned about the Combined Authority's processes in handling a complaint you should raise this with your Monitoring Officer. Protect your reputation and the reputation of the Combined Authority.

- **I do not intimidate or attempt to intimidate any person who is likely to be involved with the administration of any investigation or proceedings.**
- **I comply with any sanction imposed on me following a finding that I have breached the Code of Conduct.**

Interests¹⁵

19. As a Member:
- **I register and disclose my interests in accordance with Annex 2.**
 - **I comply with any Conflicts of Interest Policy or Protocol agreed by the Combined Authority**¹⁶
 - **I disclose significant interests in accordance with this Code.**

Gifts and Hospitality

20. As a Member:
- **I do not accept gifts or hospitality, irrespective of estimated value, which could give rise to real or substantive personal gain or a reasonable suspicion of influence on my part to show favour from persons seeking to acquire, develop or do business with the**

¹⁵ Section 29 of the Localism Act 2011 requires the Monitoring Officer to establish and maintain a register of Members' interests. You need to register your interests so that the public, Combined Authority officers and fellow Members know which of your interests might give rise to a conflict of interest.

The register is a public document that can be consulted when (or before) an issue arises. The register also protects you by allowing you to demonstrate openness and a willingness to be held accountable. You are personally responsible for deciding whether or not you should disclose an interest in a meeting or otherwise making a decision on behalf of the Combined Authority.

It can be helpful for you to know early on if others think that a potential conflict might arise. It is also important that the public know about any interest that might have to be disclosed by you or other Members when making or taking part in decisions, so that decision making is seen by the public as open and honest. This helps to ensure that public confidence in the integrity of local governance is maintained.

If you are present at a meeting, or making a decision acting alone on behalf of the Combined Authority, and you are aware that you have any **significant interest** (that is an interest that is not a disclosable pecuniary interest or a registerable personal interest) in a matter, you may disclose the interest and must consider whether to continue participating in the matter.

You should comply with the Combined Authority's [Conflicts of Interest Policy and Protocols](#), including any requirement to notify the Monitoring Officer about, and avoid personal involvement with, any application to the LEP or the Combined Authority for any loan or grant in which you may have a conflict of interest.

You should note that failure to **register or disclose a disclosable pecuniary interest is a criminal offence** under the Localism Act 2011 – See further Annex 3.

Annex 2 sets out the detailed provisions on registering and disclosing interests. If in doubt, you should always seek advice from your Monitoring Officer.

¹⁶ The [Conflicts of Interest Protocol: Loans or grants to businesses](#) sets out the process which the LEP and the Combined Authority follow to demonstrate that applications from businesses for loans or grants are dealt with in an impartial, fair and transparent way, including where they are considered by officers. It provides an additional safeguard to minimise the risk of reputational damage from any perception of undue influence. The process requires additional scrutiny of any application where a potential conflict of interest arises.

Combined Authority or from persons who may apply to the Combined Authority for any permission, licence or other significant advantage.

- **I register with the Monitoring Officer any gift or hospitality with an estimated value of at least £50 within 28 days of its receipt.**
- **I register with the Monitoring Officer any significant gift or hospitality that I have been offered but have refused to accept.**
- **I follow the Combined Authority's Gifts and Hospitality Policy.¹⁷**

¹⁷ The Combined Authority's Gifts and Hospitality Policy can be found at Annex 5.

Annex 1 – The Seven Principles of Public Life

The principles are:

Selflessness

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

Integrity

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must disclose and resolve any interests and relationships.

Objectivity

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

Accountability

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

Openness

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

Honesty

Holders of public office should be truthful.

Leadership

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

Annex 2 - Interests

Registering Interests

1. The Monitoring Officer maintains a register of interests of Members, in accordance with statutory requirements¹⁸. The register is:
 - available for inspection at the Combined Authority's offices, and
 - published on the Combined Authority's website.
2. You must notify the Monitoring Officer of pecuniary and other interests as set out below. The Monitoring Officer will enter them into the register of interests.

Disclosable Pecuniary Interests

3. A pecuniary interest is any interest of a description set out in the second column of Table 1 below.
4. A pecuniary interest is a **disclosable pecuniary interest** if it is a pecuniary interest and either:
 - it is an interest of yours, or
 - it is an interest of any other relevant person, these being:
 - your spouse or civil partner,
 - a person with whom you live as husband and wife, or
 - a person with whom you live as if you were civil partners,and you are aware that the other person has the interest.
5. You must notify the Monitoring Officer of:
 - any disclosable pecuniary interests you have within 28 days of your appointment to the Combined Authority¹⁹ and
 - any changes to your disclosable pecuniary interests within 28 days of:
 - the change occurring, or
 - you becoming aware of the change.

Other Registerable Interests

6. You should also register details of your other registerable interests which fall within the categories set out in **Table 2 (Other Registerable Interests)**.
7. Where you have an other registerable interest in any business of the Combined Authority and you have made a decision in relation to that business, you must

¹⁸ The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012.

¹⁹ If you are re-appointed to the Combined Authority, you are required to notify the Monitoring Officer of any new disclosable pecuniary interests within 28 days of being re-appointed.

make sure that any written statement of that decision records the existence and nature of your interest.

Non-registerable Significant Personal Interest

8. If you believe that you have an interest which you believe that the public, your fellow members or employees should know about, you may have a **non-registerable significant personal interest**.

Applications for any loan or grant

9. You should comply with the Combined Authority's Conflicts of Interest Protocol, including any requirement to notify the Monitoring Officer about, and avoid personal involvement with, any application to the LEP or the Combined Authority for any loan or grant in which you may have a conflict of interest.

Sensitive Interests

10. If you have an interest (whether or not a disclosable pecuniary interest or other registerable interest) which is entered in the register and which is such that you and the Monitoring Officer consider that disclosing the details of the interest could lead to you, or a person connected with you, being subject to violence or intimidation, details of the interest must not be included in:
 - any published version of the register, nor
 - any copy of the register that is made available for public inspection²⁰.

Disclosing Interests

11. If you are present at a meeting²¹ of the Combined Authority, or are acting alone on behalf of the Combined Authority²², and you are aware that you have an interest:
 - If your interest is a **Disclosable Pecuniary Interest**, if you do not have a relevant dispensation²³ you may not:
 - participate, or participate further, in any discussion of or vote on the matter at the meeting, or
 - remain in the room during the discussion or vote on the matter at a meeting, or
 - determine the matter if taking a decision alone.

²⁰ The register may state that you have an interest, the details of which are withheld under section 32(2) of the Localism Act 2011.

²¹ Including any committee, sub-committee, joint committee or joint sub-committee of the Combined Authority.

²² Section 31(6) of the Localism Act 2011

²³ See paragraph 11 of Annex 2.

- If your interest relates to an **Other Registerable Interest** (as set out in Table 2), you:
 - do not have to disclose the nature of any 'sensitive interest',
 - must notify the Monitoring Officer of the interest before the end of 28 days beginning with the date of the disclosure if the interest is not the subject of a pending notification,
 - at a meeting:
 - must disclose the interest,
 - may speak on the matter only if members of the public are also allowed to speak at the meeting,
 - must not take part in any discussion or vote on the matter,
 - should decide whether to remain in the room or withdraw during consideration of the matter,
- If you have a Non-registerable Significant Personal Interest (that is an interest which is neither a disclosable pecuniary interest or any other registerable interest) but something that you think should be known when the matter is considered you may:
 - disclose the interest, and
 - consider whether to continue participating in or determining the matter²⁴,
 - wish to leave the room during consideration of the matter.

Dispensations

12. The Combined Authority²⁵ may lift the restrictions under Paragraph 11 of this Annex by granting a dispensation in accordance with **Annex 4**.

²⁴ For example, when considering **applications for funding** you should disclose any a close connection to:

- any person (whether a family member or friend), or
- any outside body

who is a potential direct recipient or beneficiary of Combined Authority or LEP funding.

²⁵ or any committee or officer to whom this function may be delegated by the Combined Authority.

Table 1: Disclosable Pecuniary Interests

Subject	Description of Disclosable Pecuniary Interests
Employment, office, trade, profession or vocation Sponsorship	Any employment, office, trade, profession or vocation carried on for profit or gain.
Contracts	Any payment or provision of any other financial benefit (other than from the Combined Authority) made or provided within the relevant period ²⁶ in respect of any expenses incurred by you in carrying out duties as a Member, or towards your election expenses. This includes any payment or financial benefit from a trade union. ²⁷ Any contract which is made between you or a relevant person ²⁸ (or a body ²⁹ in which you or a relevant person has a beneficial interest ³⁰) and the Combined Authority: (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.
Land	Any beneficial interest in land ³¹ which is within the area of the Combined Authority
Licences	Any licence (alone or jointly with others) to occupy land in the area of the Combined Authority for a month or longer.
Corporate tenancies	Any tenancy where (to your knowledge): (a) the landlord is the Combined Authority, and (b) the tenant is a body in which you or the relevant person have a beneficial interest ³² .
Securities	Any beneficial interest in securities ³³ of a body where: (a) that body (to your knowledge) has a place of business or land in the area of the Combined Authority, and

²⁶ The relevant period means the period of 12 months ending with the day on which you notify the Monitoring Officer under paragraph 5a) and paragraph 9b) of Annex 2.

²⁷ Within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.

²⁸ As defined in paragraph 4(b) of Annex 2.

²⁹ “body in which the relevant person has a beneficial interest” means:

- a firm in which you or a relevant person is a partner or
- a body corporate of which you or a relevant person is a director, or in the securities of which you or a relevant person has a beneficial interest.

“Director” includes a member of the committee of management of an industrial and provident society;

“Securities” means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

³⁰ A beneficial interest is the right to receive benefits on assets held by another party.

³¹ Land excludes an easement, servitude, interest or right in or over land which does not carry with it a right for the relevant person (alone or jointly with another) to occupy the land or to receive income.

³² See footnote 30 above.

³³ See footnote 29 above.

- (b) either:
- (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body, or
 - (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

Table 2: Other Registerable Interests

You have an **Other Registerable Interest** in any business of the Combined Authority where it relates to or is likely to affect:

1. any body of which you are in general control or management and to which you are nominated or appointed by the Combined Authority,
2. any body,
 - exercising functions of a public nature, or
 - directed to charitable purposes, or
 - one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)

of which you are a member or in a position of general control or management.

Annex 3 – Summary of Criminal Offences and Sanctions³⁴

Offences

1. A person commits an offence if, without reasonable excuse, the person:
 - (a) fails to:
 - register any disclosable pecuniary interest³⁵, or
 - disclose a disclosable pecuniary interest not entered on the register³⁶, or
 - (b) participates in any discussion or vote, where they have a disclosable pecuniary interest.³⁷
2. A person commits an offence if when registering a disclosable pecuniary interest or disclosing an interest not entered on the register³⁸, the person provides information that is false or misleading and the person:
 - (a) knows that the information is false or misleading, or
 - (b) is reckless as to whether the information is true and not misleading.

Sanctions

3. A person who is guilty of such offence may be fined up to £5000.
4. A court may also disqualify the person for up to five years for being or becoming (by election or otherwise) a Member or co-opted Member of the Combined Authority or any other relevant authority.

³⁴ Section 34 of the Localism Act 2011.

³⁵ Under Section 30(1) or Section 31(3) or (7) of the Localism Act 2011.

³⁶ Under Section 31(2) of the Localism Act 2011.

³⁷ In contravention of Section 31(4) of the Localism Act 2011.

³⁸ Under Section 30(1) or 31(2), (3) or (7) of the Localism Act 2011.

Annex 4 - Dispensations

Requests

1. The Combined Authority³⁹ will consider any requests for a dispensation.
2. Any request for a dispensation must be made in writing to the Monitoring Officer.
3. A request will not be granted unless it is made **not less than 10 clear days** before the date of the meeting to which the request relates, except where the Monitoring Officer considers that there are exceptional circumstances.

Period

4. A dispensation must specify the period for which a dispensation has effect, which must not exceed four years.

Criteria

5. The Combined Authority may grant you a dispensation only if, having regard to all relevant circumstances, it considers that:
 - without the dispensation, the number of Members prohibited from participating in any particular business would be so great a proportion of the Combined Authority⁴⁰ as to **impede the transaction of the business**,
 - without the dispensation, the **representation of different political groups** on the Combined Authority would be so upset as to alter the likely outcome of any vote on the matter,
 - the dispensation is in the **interests of persons living in the Combined Authority's area**, or
 - it is **otherwise appropriate** to grant a dispensation.
6. In determining whether to grant dispensation requests, the Combined Authority may consider:
 - whether the nature of the Member's interest is such that to allow the Member to participate would not damage public confidence in the conduct of the Combined Authority's business,
 - whether the interest is common to the Member and a significant proportion of the general public,
 - whether the participation of the Member in the business that the interest relates to is justified by a Member's particular role or expertise, and
 - whether the interest is trivial or remote.

³⁹ Or any committee or officer to whom this function may be delegated by the Combined Authority.

⁴⁰ Or body transacting the business.

Annex 5 – Gifts and Hospitality Policy

In order to protect your position and the reputation of the Combined Authority, you should **exercise caution** in accepting any gifts or hospitality which are (or which you reasonably believe to be) offered to you because you are a Member.

The presumption should always be **not to accept** significant gifts or hospitality. However, there may be times when such a refusal may be difficult if it is seen as rudeness in which case you could accept it but must ensure it is publicly registered.

However, you do not need to register gifts and hospitality which are not related to your role as a Member, such as Christmas gifts from your friends and family. It is also important to note that it is appropriate to accept normal expenses and hospitality associated with your duties as a Member. If you are unsure, do contact your Monitoring Officer for guidance.

For the purpose of determining whether any gift or hospitality has a value of over £50, if the exact value is unknown, you should always err on the side of caution. When deciding whether to register any gift below the £50 threshold, you should take into account the **cumulative total** of any gifts received from any single source over the previous 12 months.

You should:

- never actively seek or solicit any gift or hospitality,
- discourage third parties from offering any gift or hospitality to you,
- treat expenses offered to you by any third party as a gift,
- only accept a gift or hospitality from any third party in accordance with these principles, and where acceptance is of some benefit to the Combined Authority.

You should not accept a gift or offer of hospitality which is any of the following:

- an **inducement or reward** for anything that you do as a Member – this is likely to constitute a criminal offence, from any donor seeking (or which may seek) a decision from (or business with) the LEP or the Combined Authority,
- in any circumstances which may give rise to a **perceived or actual conflict of interest** or undue influence,
- for any third party including any relative or friend of yours, except where the Head of Legal and Governance Services has confirmed in advance that that acceptance is unlikely to be perceived as giving rise to a conflict of interest,
- lavish or over-generous, nor
- where offers from the same donor are **over-frequent**.
- a gift of cash (or items of specific monetary value such as vouchers).

Document version control

Municipal Year:	2021-22
Version:	1 - 21/22
Document approved by:	<i>The Combined Authority</i>
Date:	<i>24 June 2021</i>
To be of effect from:	<i>24 June 2021</i>

Part 5

Section 5.2 – Procedure for considering complaints alleging a failure to comply with the Members’ Code of Conduct

Introduction

1. The Members’ Code of Conduct applies to Combined Authority Members and voting Co-opted Members¹ when they are acting in that capacity.

Submitting a Complaint

2. A complainant alleging a failure to comply with the Code should submit their complaint in writing to the **Monitoring Officer** for initial assessment².
3. The complaint must set out:
 - a. **who** was involved,
 - b. the alleged **misconduct**,
 - c. **when** and **where** it occurred, and
 - d. how the complainant wants the complaint to be **resolved**.
4. A complainant should complete a **complaint form**, but this is not required if the complainant provides the details required in writing.
5. If a complainant does not complete a form and does not provide the required details in writing, the Monitoring Officer will ask them to re-submit the complaint by completing a form.

Stage 1 - Initial Assessment by the Monitoring Officer

6. The Monitoring Officer will notify a member about any complaint against them³.

¹ and any substitute. Any reference in this procedure to a “Member” should be construed as being a reference to any member to whom the Code applies including the Mayor and the Deputy Mayor for Policing and Crime (where the Deputy Mayor for Policing and Crime is a Combined Authority Member and the complaint is in relation to a PCC Function that has been referred by the Police and Crime Panel to the Monitoring Officer)

² Where any potential conflict of interest arises from the involvement of the Monitoring Officer, the Combined Authority’s Managing Director may ask a Monitoring Officer from another authority to deal with the complaint, including undertaking any investigation.

³ This is for information only, where the Monitoring Officer decides that the complaint should not be dealt with further under this procedure.

7. The Monitoring Officer will decide whether the complaint should be dealt with under Stage 2 of this procedure⁴.
8. Where a complaint may relate to a member in their capacity as a member of a Constituent or Non-Constituent Council, the Monitoring Officer will consult with the Monitoring Officer of the relevant council.

Complaints which will not be dealt with under Stage 2

9. No complaint will be pursued unless it is in the opinion of the Monitoring Officer, in the public interest to do so. Except in exceptional circumstances, a complaint will not be dealt with under Stage 2 of this procedure if it is a complaint which:
 - a. is submitted **anonymously**,⁵
 - b. does **not identify the member**,
 - c. relates to a member's **personal or private life**,
 - d. alleges that a **criminal offence** has been committed,
 - e. is about **failing to respond** to a request from a constituent or other individual,
 - f. relates to alleged actions by **officers** of the Combined Authority, or a **service related issue**,
 - g. relates to a **decision** of the Combined Authority **or the Mayor**, a committee of the Combined Authority or an officer of the Combined Authority,
 - h. relates to a person who is **no longer a member**,
 - i. refers principally to an alleged incident **before the person became a Member**,
 - j. refers principally to an alleged incident which happened so long **in the past** that there would be little benefit in taking action,

⁴ The Monitoring Officer should consult an Independent Person before deciding whether a complaint should be pursued by way of a formal investigation.

⁵ Complaints which contain a request for the complainant's identity to be withheld may be dealt with under this procedure, although the complainant's identity will only be withheld if, in the opinion of the Monitoring Officer, there are exceptional circumstances. If the Monitoring Officer does not consider that the complainant's identity should be withheld, the complainant will be given the opportunity to withdraw the complaint. Anonymous complaints which reveal potential fraud or corruption will be referred to the Head of Internal Audit for consideration under the Combined Authority's Whistle Blowing Policy.

- k. contains **trivial allegations**, or which appear to be simply **malicious, vexatious, politically motivated** or **tit-for-tat**⁶, or
 - l. concerns alleged behaviour which has **already** been **investigated** or subject to some form of action.
10. If a complaint alleges that a criminal offence has been committed,⁷ the Monitoring Officer may direct any such complaint to the West Yorkshire Police⁸. Before making this decision, the Monitoring Officer may consult with:
- the **Mayor**,
 - the Chair of the Governance and Audit Committee,
 - the Head of Paid Service,
 - the Section 73 Chief Finance Officer, or
 - an Independent Person⁹.
11. The Monitoring Officer will refer any complaint about an **officer or service related issue** to the Head of Paid Service.
12. The Monitoring Officer will explain in writing to the complainant why the complaint will not be dealt with under Stage 2 of this procedure.
13. There is no appeal against any decision taken by the Monitoring Officer at this stage.

Stage 2 - Informal Resolution

14. If the Monitoring Officer decides that the complaint should be dealt with under Stage 2 of this procedure, the Monitoring Officer will refer the complaint to the member and any relevant Group Leader¹⁰ or the **Mayor**¹¹ if the complaint **relates to the Deputy Mayor for Policing and Crime**, with a request that they seek to resolve the complaint. The Monitoring Officer will provide the member with:
- a reasonable timescale for this (usually **20 working days**), and
 - the contact details for an Independent Person.

⁶ The Monitoring Officer should give an Independent Person the option to review and comment on allegations which the Monitoring Officer is minded to dismiss as falling within this provision.

⁷ Such as fraud, or an offence relating to failing to register or disclose a disclosable pecuniary interest under Section 34 of the Localism Act 2011.

⁸ Serious complaints and conduct matters made against the Mayor and Deputy Mayor for Policing and Crime in relation to PCC Functions must be referred to the Director General of the Independent Office for Police Conduct in accordance with the Policing Protocol Order 2011 as modified by the West Yorkshire Combined Authority (Election of Mayor and Functions) Order 2021.

⁹ Appointed under S28 Localism Act 2011.

¹⁰ If the complaint is about a Group Leader, the Monitoring Officer may refer the matter to the relevant Group Whip within the relevant council.

¹¹ Any complaint relating to the Deputy Mayor for Policing and Crime will be referred to the Mayor

15. The Monitoring Officer will also write to the complainant to explain that the member has been asked to seek to resolve the complaint. The Monitoring Officer will provide the complainant with a copy of this procedure.
16. Informal resolution may include:
 - a. an **explanation** by the member of the circumstances surrounding the complaint,
 - b. an **apology** from the member,
 - c. an agreement from the member to attend relevant **training** or to take part in a **mentoring** process,
 - d. an offer of **mediation or conciliation** between the member and the complainant, or
 - e. **any other action** capable of resolving the complaint.
17. The member may seek guidance from:
 - a Group Leader or Group Whip, and/or
 - the Monitoring Officer, and/or
 - the Mayor.
18. The member may also ask an **Independent Person** for their view of the complaint and about an appropriate form of resolution. To avoid a conflict of interests arising, an Independent Person should not provide views to both a member and the Governance and Audit Committee on the same complaint.
19. The member may also ask the complainant what form of informal resolution they would find acceptable, particularly if the resolution they have requested in their complaint is not possible.
20. At the end of the 20 working day period, the Monitoring Officer in consultation with the Chair of the Governance and Audit Committee, will decide whether the complaint is resolved.
21. Where the complaint is **resolved**, the Monitoring Officer will confirm to the complainant and the member in writing that there will be **no further action** taken under this procedure.
22. Where the complaint is **not resolved**, the Monitoring Officer will refer the complaint to the **Governance and Audit Committee**. The Monitoring Officer will ask the complainant and the member to submit **written representations** about the complaint and any response to it.
23. There is no appeal against any decision of the Monitoring Officer under this stage.

Stage 3 – Governance and Audit Committee¹²

24. The Monitoring Officer will prepare a report for the Governance and Audit Committee, which will include:
 - a. a **copy of the complaint** and any **response** from the member,
 - b. **minutes** of any relevant meetings,
 - c. details of **measures taken** to address the complaint,
 - d. any further **written representations** from the complainant or the member, and
 - e. any **view** submitted in writing to the Committee by an Independent Person¹³.
25. Where possible the Governance and Audit Committee will consider the report within **20 working days** of it being finalised by the Monitoring Officer.
26. The Monitoring Officer will invite the Group Leader, Group Whip **or the Mayor** (if relevant) to attend the meeting of the Governance and Audit Committee.¹⁴
27. Before reaching a decision on the complaint, the Committee must seek, and take account of, the view of **an Independent Person** in relation to the complaint¹⁵. The Monitoring Officer will invite that Independent Person to attend the meeting of the Governance and Audit Committee¹⁶. If the Independent Person cannot attend the meeting they must submit their view to the Governance and Audit Committee in writing.
28. The Monitoring Officer will attend the meeting to present their report.
29. The Governance and Audit Committee will consider the report of the Monitoring Officer and may also ask questions of anyone present at the meeting.

¹² Or any sub-committee appointed by the Governance and Audit Committee which has authority to determine complaints under this procedure.

¹³ See further below.

¹⁴ The Chair may invite them to speak at the meeting, but any Group Leader or Group Whip who attends in response to such an invitation cannot participate or vote as a member of the committee.

¹⁵ As required by Section 28(7)(a) of the Localism Act 2011. The Monitoring Officer will ask the Independent Person to confirm that they are still independent and to notify the Monitoring Officer of any circumstances which might be perceived as presenting a potential conflict of interest on the part of the Independent Person. If the Independent Person is not still independent, or in the event of any conflict of interest arising, the Monitoring Officer will refer the matter to another Independent Person.

¹⁶ The Chair will ask the Independent Person to give their view at the meeting, but an Independent Person cannot participate or vote as a member of the committee.

30. The Governance and Audit Committee must decide whether the member has failed to comply with the Code.
31. If the Governance and Audit Committee is unable to reach a decision on the complaint on the basis of the information before it, it may adjourn the meeting and request that the Monitoring Officer seeks any further information required. However, when doing so, the Committee should consider whether such information will be readily available to the Monitoring Officer. Any request for information must be provided to both the complainant and the member.
32. If the Governance and Audit Committee decides¹⁷ that the member did **not** fail to comply with the Code, the complaints process will conclude.
33. If the Governance and Audit Committee decides¹⁸ that the member **has failed** to comply with the Code, the Committee must go on to consider:
 - a. Whether to take action against the member; and
 - b. What **action** it should recommend to the Combined Authority; and
 - c. What outcome it will report to the Police and Crime Panel (if relevant)

Recommendations to the Combined Authority

34. Where the Governance and Audit Committee decides that the member has failed to comply with the Code, the Governance and Audit Committee may recommend:
 - a. a **formal letter to the member** from the Chair of the Governance and Audit Committee which will be copied to the Group Leader and/or the Group Whip **and/or the Mayor,**
 - b. **removal** by the Combined Authority of the member **from any committee or sub-committee** (if they are a member of it), either permanently or for a specified period of time,
 - c. a **formal letter** from the Chair of the Governance and Audit Committee **to the Leader of the appointing Council** copied to the relevant Monitoring Officer and Group Whip,
 - d. **formal censure** by the Combined Authority, or
 - e. **formal letter to the Mayor,** where the member either exercises delegated authority on behalf of the Mayor, or is the Deputy Mayor for Policing and Crime.
35. Whether or not there has been a failure to comply with the Code, the Governance and Audit Committee may in any event make **general recommendations** to the Combined Authority with a view to promoting and

¹⁷ On the balance of probabilities, that is, it is more likely than not.

¹⁸ See footnote above.

maintaining high standards of conduct within the Combined Authority. Such recommendations may include changes to Combined Authority procedures and practices or training for members in general.

- 36.** Within **5 working days** of the meeting the Chair of the Governance and Audit Committee will write to the complainant and the member explaining the decision of the Committee and setting out any recommendations made to the Combined Authority **and to be reported to the Police and Crime Panel (if relevant).**
- 37.** The Monitoring Officer will report all recommendations of the Governance and Audit Committee to the next available meeting of the Combined Authority.
- 38.** The Monitoring Officer will publish a decision notice as soon as practicable on the Combined Authority's website, to include:
 - a brief statement of facts,
 - the provisions of the Code engaged by the allegations,
 - the view of the Independent Person,
 - the reasoning of the Governance and Audit Committee, and
 - any sanction recommended or applied.
- 39.** There is no right of appeal against a decision of the Governance and Audit Committee.

Document version control	
Municipal Year:	2021-22
Version:	1 - 21/22
Document approved by:	<i>The Combined Authority</i>
Date:	<i>24 June 2021</i>
To be of effect from:	<i>24 June 2021</i>

Part 5

Section 5.4 – Conflicts of Interest Policy

1. Introduction

- 1.1 The Leeds City Region Enterprise Partnership (the LEP) and the West Yorkshire Combined Authority (the Combined Authority) are committed to ensuring that the Members and officers act in line with the **Nolan Principles** of public life, which are selflessness, integrity, objectivity, accountability, openness, honesty and leadership.
- 1.2 This Conflicts of Interest Policy applies to:
- any member of the LEP Board,
 - the Mayor and any other Combined Authority Member,
 - any voting Co-optee on a Combined Authority committee or panel, including any advisory panel which reports to the LEP,
 - any officer of the Combined Authority, and
 - any officer of a local authority who advise the Combined Authority or LEP.
- 1.3 The policy provides an overview of how conflicts of interest are managed, by reference to the procedures which the LEP and the Combined Authority have in place to maintain high ethical standards and protect their reputation against any allegation of conflicting interests. These include requirements to register and declare interests.
- 1.4 The policy must be followed throughout all decision-making processes; the LEP and the Combined Authority are committed to ensuring that this policy applies to decisions taken at formal meetings or by individuals on behalf of the LEP or the Combined Authority under delegated authority. It is communicated to everyone involved in decision-making by the LEP and Combined Authority, to ensure their commitment to it.
- 1.5 To ensure transparency, the LEP and the Combined Authority record and publish decisions in accordance with agreed procedures.

2. Definition

A conflict of interest is a set of circumstances which creates a risk that an individual's ability to apply judgement or act in a role is, or could be, impaired or unduly influenced by a secondary interest of that individual, or of another person.

- 2.1 For example, a conflict of interest would arise where a member of the LEP Board has an interest, for instance, as a shareholder in a company that is a potential beneficiary of grant funding, conflicting with the interests of the LEP.

- 2.2 Conflicts of interest may inhibit open discussions and may result in irrelevant considerations being taken into account or decisions being taken that are not in the best interests of the LEP nor of the Combined Authority.
- 2.3 This policy covers **commercial, personal, actual or potential conflicts of interests**; for the purposes of this policy, the *perception* of competing interests, impaired judgement or undue influence can also amount to a conflict of interest.

3. General

All members and officers must **take personal responsibility** for declaring their interests and avoiding perceptions of bias.

Where any conflict of interest arises outside of those which they are specifically required to register or declare, they should **err on the side of caution** and declare these interests in line with the Nolan Principles.

- 3.1 This policy applies whether they are decision-makers, consultees or involved in any other way in relation to any decision to be taken by the LEP, the Combined Authority or the Mayor.

4. Members of the LEP Board

- 4.1 Members of the LEP Board are required to comply with the **LEP Board Members' Code of Conduct**. The Code requires members to comply with the Nolan Principles and sets out the procedures for registering and declaring pecuniary and non-pecuniary interests, and managing conflicts which arise at a formal meeting of the LEP Board. It also extends to any conflict of interest arising in respect of an urgent decision taken by the Chair on behalf of the LEP.
- 4.2 The LEP Board's **Procedure for Considering Complaints** alleging a failure to comply with the LEP Board Members' Code of Conduct sets out the process that the LEP will follow if a member of the LEP Board is alleged to have failed to comply with the Code.
- 4.3 **Registers of interests** completed by members of the LEP Board are published on the Combined Authority's web-site, accessible from the LEP's web-site.
- 4.4 The Code also includes specific requirements and restrictions in relation to disclosing an interest:
- when **considering applications for funding**
 - when **applying for a loan or grant**
 - when **applying to provide contracted work or services**.
- 4.5 It also addresses **canvassing for appointments** to the Combined Authority.

4.6 The Code of Conduct sets out requirements for declaring pecuniary and other interests at formal meetings of the LEP Board. The **Conflicts of Interest Protocol: applications for loans or grants** manages conflicts of interest which may arise when a decision is taken by an officer, in respect of a loan or grant from the LEP or the Combined Authority.

5. Combined Authority Members and voting Co-optees on any Combined Authority committee or panel

5.1 These members are required to comply with the **Combined Authority's Members' Code of Conduct** in Part 5 of the Constitution. The Code sets out the procedures for registering and declaring pecuniary and other interests, and managing conflicts which arise at any formal meeting of the Combined Authority or a committee or panel appointed by the Combined Authority, including advisory panels which report to the LEP.

5.2 The Code of Conduct sets out requirements for declaring pecuniary and other interests at formal meetings, where members are decision-makers. The **Conflicts of Interest Protocol: applications for loans or grants** manages any conflict of interest which may arise when a decision is taken by an officer, in respect of a loan or grant from the LEP or the Combined Authority.

5.3 The Combined Authority's **Procedure for Considering Complaints** alleging a failure to comply with the Members' Code of Conduct in Part 5 of the Constitution sets out the process to be followed if a member is alleged to have failed to comply with the Code.

5.4 **Registers of interests** are published on the Combined Authority's web-site.

5.5 Article 12 (Officers) in Part 2 of the Constitution also specifies additional requirements and restrictions in relation to:

- **canvassing for appointments** to the Combined Authority, and
- **disclosing any relationship** between the member and an officer, or a candidate for employment.

6. Officers

6.1 Officers of the Combined Authority must comply with the **Combined Authority's Officer Code of Conduct** and **Gifts and Hospitality Policy** in Part 5 of the Constitution when they are working for the Combined Authority or advising the LEP.

6.2 The **LEP Constitution** also requires:

- senior officers of the Combined Authority and officers involved in advising the LEP to complete a **LEP Officer's register** of interests,
- any officer from another local authority advising the LEP to comply with their authority's officer Code of Conduct, and

- any officer advising the LEP Board to be mindful of potential conflicts of interest, and exclude themselves for advising on any matter where their personal or professional interests are such that their integrity or objectivity may be questioned.

6.3 Article 12 (Officers) in Part 2 of the Constitution requires officers of the Combined Authority to disclose any **relationship with a member**. It also reflects statutory provisions relating to:

- prohibiting officers from being operators, directors, partners or employees of public passenger transport services, and
- recording **pecuniary interests in contracts**.

6.4 The **Combined Authority's Contracts Standing Orders** in Part 4 of the Constitution addresses potential conflicts of interests arising in respect of **contracts** with the Combined Authority for goods, services or an interest in property.

7. Loans or grants to businesses

7.1 At the request of members, to promote greater transparency, the **Conflicts of Interest Protocol: loans or grants to businesses** in Part 5 of the Constitution, sets out a process which the LEP and the Combined Authority follows to demonstrate that applications from businesses for loans or grants are dealt with in an impartial, fair and transparent way outside of formal meetings, by an officer. It provides a safeguard (for the LEP, the Combined Authority and for applicants) to minimise the risk of reputational damage from any perception of undue influence.

7.2 The process requires additional scrutiny of any application where a potential conflict of interest arises.

8. Adult Education

8.1 In accordance with statutory guidance related to devolved Adult Education Budgets, the Combined Authority has approved a Conflicts of Interest Protocol: Adult Education Budget in Part 5 of the Constitution.

Document version control	
Municipal Year:	2021-22
Version:	1 - 21/22
Document approved by:	<i>The Combined Authority</i>
Date:	<i>24 June 2021</i>
To be of effect from:	<i>24 June 2021</i>

Part 5

Section 5.5 – Conflicts of Interest Protocol: Loans or grants to businesses

1. Purpose

- 1.1 The Combined Authority's Code of Conduct in Part 5 of the Constitution and the Code of Conduct adopted by the LEP address how members are required to register and declare pecuniary and other interests at formal meetings where members take decisions.
- 1.2 This **Conflicts of Interest Protocol: loans or grants to businesses** sets out the process which the LEP and the Combined Authority follow to demonstrate that applications from businesses for loans or grants are dealt with in an impartial, fair and transparent way, including where they are considered by officers. It provides an additional safeguard (for the LEP, the Combined Authority and for applicants) to minimise the risk of reputational damage from any perception of undue influence.
- 1.3 The process requires additional scrutiny of any application where a potential conflict of interest arises.

2. Scope

- 2.1 This protocol should be followed where an application for a loan or grant is made by any business (including a company, social enterprise or a sole trader) to the LEP or to the Combined Authority¹.
- 2.2 The protocol applies to:
 - any member of the LEP Board,
 - the Mayor and any other Combined Authority Member, and
 - any voting Co-optee on a committee or panel of the Combined Authority, **including any thematic committee**.
- 2.3 It applies to both local authority and private sector representatives, and their substitutes.

3. General

- 3.1 This protocol supplements the Conflicts of Interest Policy. It does not replace or alter any requirement of the Codes of Conduct for the LEP and the

¹ Including any grant or application under the following funding streams or programmes: Access Innovation, Apprenticeship Grants for Employers, Business Growth Programme, Cycling and Walking Fund, Digital Inward Investment Fund, Growing Places Fund, Resource Efficiency Fund, Strategic Business Growth and Strategic Inward Investment Fund.

Combined Authority, nor any other procedure of the LEP or the Combined Authority which addresses conflicts of interest.

Where any conflict of interest arises outside of those specifically required to be registered or declared under any Code of Conduct, a procedure referred to in the Conflict of Interest Policy or this protocol, a member should declare their interests **erring on the side of caution**, in line with the Nolan Principles.

4. Setting policies and strategies relating to loans and grants

- 4.1 Members must follow the relevant Codes of Conduct which set out requirements for registering and declaring interests at meetings. These Codes restrict members' involvement in decision making at formal meetings of the LEP Board, the Combined Authority and committees and panels where a conflict of interest arises.
- 4.2 However, to secure the input of suitable expertise and a range of representative views into the decision-making process, appropriate involvement in matters in which Members may have an interest² is facilitated by exceptions and dispensations granted under the Codes.

Members are not generally precluded from participating in or voting on developing or setting any overarching policy or strategy, including setting criteria against which any application for a loan or grant will be assessed. However, **this is subject to exceptions** such as where a direct financial interest arises.

At any meeting where an item relates to a **change of criteria** for any loan or grant programme in respect of which a member (or a business in which they have registered an interest) has applied for a loan or grant during the previous 24 months (successfully or otherwise), the member should declare the application. Any such declaration should be noted in the minutes of the meeting, but the member may nevertheless participate and vote in the decision, unless otherwise precluded by the Code or the application is still to be determined.

A member may, however, choose not to participate or vote in the item if they are aware that any proposed change in criteria may affect an application which they (or the business in which they have registered an interest) intend to make for the loan or grant.

Members should check with the Monitoring Officer if they are unsure whether they may participate or vote in relation to any particular item.

² For example, where they are appointed because of their expertise in a particular sector.

5. Members to notify businesses of their involvement with the LEP or the Combined Authority

5.1 Any member who (to comply with a Code of Conduct) has registered an interest in a business, **including any interest of their spouse or civil partner**, must:

- **notify that business of their involvement** with the LEP or the Combined Authority,
- **ask the business to declare their involvement** as a conflict of interest when applying for any relevant loan or grant, and
- **make arrangements for the business to notify them** on any occasion when the business applies for a relevant loan or grant.

6. Applying for a loan or grant – applicant business

6.1 The application form for a loan or grant to businesses will ask the applicant to declare whether:

- the applicant, any Director, Trustee or employee of the business, or
- their spouse or civil partner³ is:
 - a) a member of the LEP Board,
 - b) a Combined Authority Member, or
 - c) a voting Co-optee on any committee or panel appointed by the Combined Authority (including any **thematic committee**).

A business should be advised of any such potential conflict of interest by the relevant member, under paragraph 5 above. Nevertheless, each business should take such additional steps as are reasonably practicable to ensure that any declaration is full and accurate.

7. Members' actions where a conflict of interest arises

7.1 A Member must also:

- a) **notify the Monitoring Officer⁴** on each occasion where:
 - they apply for a loan or grant, or
 - a business which is registered as an interest on their register of interest applies for a loan or grant⁵,
 - any other interest arises which may be perceived as giving rise to a conflict of interest (for example, where an application is made by a close friend, or family member, or they are related to an officer of the Combined Authority).

³ Any reference in this protocol to a spouse or partner should be taken as including any person with whom the member lives as a spouse or civil partner

⁴ The Executive Support Officer (Private Sector Representatives) may receive notifications from private sector representatives, and the Governance Services Manager from local authority representatives on behalf of the Monitoring Officer.

⁵ This includes any interest of their spouse or civil partner which they are required to register.

The notification to the Monitoring Officer should identify

- the name of **the applicant**,
- the **type of funding** applied for (including the funding stream if known), and
- the nature of **the potential conflict of interest**.

The date of the application should also be stated (if known).

- b) so far as reasonably practicable **avoid any personal involvement**⁶ with any application to the LEP or the Combined Authority for any loan or grant, or
- c) where it is not reasonably practicable to avoid personal involvement with an application:⁷
 - **declare on any application form their involvement** if they are not a signatory,
 - **do not discuss the application verbally** with any officer of the Combined Authority, and
 - **communicate only in writing** about the application after it has been submitted.

8. Advising on loan and grant applications

- 8.1 To avoid improper use of “inside information” about the assessment process for applications, where a member’s role includes or has included **advising on individual grant and loan applications from businesses**, no application from them, their spouse or civil partner, or from a business which they have (or should have) registered as an interest under the relevant Code of Conduct shall be considered until **6 months** has elapsed since they carried out that role.

9. Considering loan and grant applications

- 9.1 Every application is considered on its own merits, and no applications are granted unless the eligibility criteria for the loan or grant are met.

No member may participate or vote on any decision-making relating to any application in respect of which they have a conflict of interest.

Members must not seek in any way to improperly influence the outcome of any application which has (or may be) made in which they have an interest.

⁶ This includes advising on, drafting or signing the application

⁷ For example, where they are a sole trader and apply on their own behalf

9.2 Where an interest has been declared by an applicant on the application form, and/or a member (or where an interest is otherwise brought to the attention of a relevant Director⁸), the application will not be progressed unless:

- a) the Monitoring Officer has confirmed that:
 - the member has **registered the business as an interest** on their register in accordance with the requirements of the relevant Code of Conduct, and
 - a full **declaration of interest** by the member has been received in relation to the application in accordance paragraph 7 of this protocol.

And

- b) the relevant Director has confirmed that:
 - the **applicant** has made a **declaration of interest** on the application form in accordance with paragraph 6,
 - the **member did not discuss the application verbally** with any officer of the Combined Authority after its submission, nor otherwise **seek to improperly influence** the application.

9.3 Subject to a) and b) above, where an interest arises, the application should be referred for determination by:

- the Combined Authority's Managing Director, or
- a meeting of the Combined Authority or a relevant committee⁹.

9.4 An application may only be granted further to a recommendation from a **relevant Director** who has assessed the application, and confirmed that it has been considered on its own merits and meets relevant eligibility criteria.

9.5 The decision-maker should take into account any other relevant information which relates to the conflict of interest.

9.6 The **record of any decision** about an application where a conflict of interest has arisen must record the conflict of interest declared by the member, and that this protocol has been followed¹⁰.

10. Reporting

10.1 The Monitoring Officer will **annually report** to the LEP Board and Combined Authority's Governance and Audit Committee on the number and outcome of applications considered in accordance with this protocol during the financial year and on any breaches of the protocol.

⁸ Each relevant Director will carry out a **sample audit** of applications at quarterly intervals, to review whether declarations are being made in line with this protocol.

⁹ For example, where the Managing Director considers that they should not exercise their delegated authority in respect of the application.

¹⁰ This extends to any published record of the loan or grant.

Document version control

Municipal Year:	2021-22
Version:	1 - 21/22
Document approved by:	<i>The Combined Authority</i>
Date:	<i>24 June 2021</i>
To be of effect from:	<i>24 June 2021</i>

Part 5

Section 5.4 – AEB Conflicts of Interest Policy

1. Introduction

- 1.1 The West Yorkshire Combined Authority (the Combined Authority) are committed to ensuring that the members and officers act in line with the **Nolan Principles** of public life, which are selflessness, integrity, objectivity, accountability, openness, honesty and leadership.
- 1.2 This Conflicts of Interest Policy applies to:
- any member of the LEP Board,
 - the Mayor and any other Combined Authority Member,
 - any member of the **Employment and Skills Committee**,
 - any officer of the Combined Authority, including those on the Adult Education Performance Board
 - any officer of a local authority who advise the Combined Authority, and
 - any member of the AEB performance & partnership groups, who advise the Combined Authority and its individual officer boards
- 1.3 The policy provides an overview of how conflicts of interest are managed, by reference to the procedures in place to maintain high ethical standards and protect organisational and personal reputations against any allegation of conflicting interests. These include requirements to register and declare interests.
- 1.4 The policy must be followed throughout all decision-making processes; the Combined Authority are committed to ensuring that this policy applies to decisions taken at formal meetings or by individuals on behalf of the Combined Authority under delegated authority. It is communicated to everyone involved in decision-making by the Combined Authority in relation to Adult Education, to ensure their commitment to it.
- 1.2 To ensure transparency, the Combined Authority record and publish decisions where this is provided for by their agreed procedures.

2. Definition

A conflict of interest is a set of circumstances which creates a risk that an individual's ability to apply judgement or act in a role is, or could be, impaired or unduly influenced by a secondary interest of that individual, or of another person.

3. General

All members and officers must **take personal responsibility** for declaring their interests and avoiding perceptions of bias.

Where any conflict of interest arises outside of those which they are specifically required to register or declare, they should **err on the side of caution** and declare these interests in line with the Nolan Principles.

- 3.1 This policy applies whether they are decision-makers, consultees or involved in any other way in relation to any decision to be taken by the Combined Authority in relation to Adult Education.

4. Members of the LEP Board

- 4.1 Members of the LEP Board are required to comply with the LEP Board Members' Code of Conduct. The Code requires members to comply with the Nolan Principles and sets out the procedures for registering and declaring pecuniary and non-pecuniary interests, and managing conflicts which arise at a formal meeting of the LEP Board. It also extends to any conflict of interest arising in respect of an urgent decision taken by the Chair on behalf of the LEP.
- 4.2 The LEP Board's Procedure for Considering Complaints alleging a failure to comply with the LEP Board Members' Code of Conduct sets out the process that the LEP will follow if a member of the LEP Board is alleged to have failed to comply with the Code.
- 4.3 Registers of interests completed by members of the LEP Board are published on the Combined Authority's web-site, accessible from the LEP's web-site.
- 4.4 The Code also includes specific requirements and restrictions in relation to disclosing an interest:
- when considering applications for funding
 - when applying to provide contracted work or services.

5. Combined Authority Members and voting Co-optees on the Employment and Skills Committee.

- 5.1 These members are required to comply with the Combined Authority's Members' Code of Conduct in Part 5 of the Constitution. The Code sets out the procedures for registering and declaring pecuniary and other interests, and managing conflicts which arise at any formal meeting of the Combined Authority or a committee or panel appointed by the Combined Authority, including the Employment and Skills **Committee**.
- 5.2 The Combined Authority's **Procedure for Considering Complaints** alleging a failure to comply with the Members' Code of Conduct in Part 5 of the Constitution sets out the process to be followed if a member is

alleged to have failed to comply with the Code.

5.3.1 **Registers of interests** are published on the Combined Authority's web-site.

6. **Non-voting advisory representatives on the **Employment and Skills Committee****

- 6.1 An advisory representative must declare any interest arising any matter to be considered or being considered at a meeting of the **Committee**:
- in which they **personally** stand to make a direct financial gain or loss, or
 - where the matter relates specifically to a **potential grant to or contract with their employer**.
- 6.2 All declarations will be minuted, and the Chair of the meeting may ask any individual not to participate in any item where a conflict of interest arises.

7. **Officers of the Combined Authority and other Local Authorities**

- 7.1 Officers of the Combined Authority and the LEP must comply with the **Combined Authority's Officer Code of Conduct** and **Gifts and Hospitality Policy** in Part 5 of the Constitution when they are working for the Combined Authority or advising the LEP.
- 7.2 Officers from another local authority must comply with their authority's Officer Code of Conduct and any Gifts and Hospitality Policy.
- 7.3 The **LEP Constitution** also requires:
- senior officers of the Combined Authority and officers involved in advising the LEP to complete a **LEP Officer's register** of interests,
 - any officer from another local authority advising the LEP to comply with their authority's officer Code of Conduct, and
 - any officer advising the LEP Board to be mindful of potential conflicts of interest, and exclude themselves for advising on any matter where their personal or professional interests are such that their integrity or objectivity may be questioned.
- 7.4 **Contracts Standing Orders** in Part 4 of the Constitution address potential conflicts of interests arising in respect of **contracts** with the Combined Authority for goods, services, or an interest in property.

Document version control	
Municipal Year:	2021-22
Version:	1 - 21/22
Document approved by:	<i>The Combined Authority</i>
Date:	<i>24 June 2021</i>
To be of effect from:	<i>24 June 2021</i>

Part 5 – Codes and Protocols

Member and Officer Protocol

Contents

Part 5 – Codes and Protocols	1
Member and Officer Protocol.....	1
Introduction	1
Roles Of Members	2
Roles Of Officers.....	3
Respect and Courtesy.....	3
Provision of Advice and Information to Members	5
Confidentiality.....	7
Provision of Support Services to Members	8
The Combined Authority’s Role as Employer.....	9
Political Activity	9
Sanctions	10
Conclusion	10

The purpose of this Protocol is to guide Members and officers of the Combined Authority in their relations with one another.

Introduction

1. This Protocol applies to Combined Authority Members and Co-opted Members¹ as well as those on any working group or **committee** created by the Combined Authority or the Mayor (together referred to, for the purposes of this Protocol, as “Members”).
2. It also applies to officers of the Combined Authority.
3. The Protocol is not prescriptive and it may not cover all situations. However, it does provide guidance on some of the issues that most commonly arise. The approach to these issues will serve as a guide to dealing with other issues.
4. The Protocol is a written statement of current practice and convention. It seeks to promote greater clarity and certainty.

¹ The Protocol applies to all voting and non-voting Co-optees including private sector representatives.

5. It also seeks to reflect the principles underlying the respective rules of conduct that apply to Members and officers. Its purpose, therefore, is to enhance and maintain the integrity (real and perceived) of local government.
6. Members and officers are servants of the public and they depend on each other in carrying out the work of the Combined Authority. Members who are elected are responsible to the electorate. All Members serve only so long as their term of office or co-option lasts, while officers are accountable to the Combined Authority as their employer. Their job is to give advice to the Combined Authority, as well as to individual Members, and to carry out the Combined Authority's work under the direction and control of the Combined Authority and the Mayor.
7. Mutual respect between Members and officers is essential to good local government. However, close personal familiarity between individual Members and officers can damage this relationship and prove embarrassing to other Members and officers.
8. The relationship has to function without compromising the ultimate responsibilities of officers to the Combined Authority as a whole, and with due regard to such technical, financial, professional and legal advice that officers can legitimately provide to Members. The Protocol seeks to set a framework that assists the working relationships between Members and officers.

Roles Of Members

9. Members undertake many different roles. Broadly these include:
 - expressing political values and supporting the policies of the party or group to which they belong (if any) – see further the section entitled “*Political Activity*” at paragraph 47 onwards below,
 - representing their area and advocating for the citizens who live in the area,
 - participation in active partnerships with other organisations as community leaders,
 - contributing to the decision-making by the Combined Authority, or any joint committees, outside bodies and partnership organisations to which the Member has been appointed,
 - developing and reviewing policy and strategy, and
 - monitoring and reviewing policy implementation and service quality.

Roles Of Officers

10. Briefly, officers have the following main roles:
- ensuring that the Combined Authority always acts in a lawful manner,
 - implementing agreed policy,
 - managing and providing the services for which the Combined Authority has given them responsibility and being accountable for the efficiency and effectiveness of those services,
 - providing advice to the Combined Authority and to individual Members in respect of the services provided (see further the section entitled “*Provision of Advice and Information to Members*” from paragraph 21 onwards below and the section entitled “*Confidentiality*” from paragraph 36 onwards), and
 - initiating policy proposals.

Respect and Courtesy

11. For the effective conduct of Combined Authority business there must be mutual respect, trust and courtesy in all meetings and contacts, both formal and informal, between Members and officers. This plays a very important part in the Combined Authority's reputation and how it is seen in public. It is very important that both Members and officers remember their respective obligations to enhance the Combined Authority's reputation and to do what they can to avoid criticism of other Members, or other officers, in public places.

Undue Pressure

12. It is important in any dealings between Members and officers that neither should seek to take unfair advantage of their position.
13. In their dealings with officers (especially junior officers) Members need to be aware that it is easy for them to be overawed and feel at a disadvantage. Such feelings can be intensified where Members hold senior and/or political office. Certain statutory officers – the Head of Paid Service, the Section 73 Chief Finance Officer and the Monitoring Officer - have specific roles² which Members must understand and respect. Members should have particular regard to any advice given by them.
14. A Member should not apply undue pressure on an officer either to do anything that they are not empowered to do or to undertake work outside normal duties

² See further Article 12 (Officers) of Part 2 of this Constitution.

or outside normal hours. Particular care needs to be taken in connection with the use of Combined Authority property and services³.

15. Similarly, an officer must neither seek to use undue influence on an individual Member to make a decision in their favour, nor raise personal matters to do with their job, nor make claims or allegations about other officers⁴.

Familiarity

16. Close personal familiarity between individual Members and officers can damage the principle of mutual respect. It could also, intentionally or accidentally, lead to the passing of confidential information or information which should not properly be passed between them, such as personal details.
17. Such familiarity could also cause embarrassment to other Members and/or other officers and even give rise to suspicions of favouritism.
18. For these reasons close personal familiarity must be avoided and Members and officers should address each other formally in public (whether in person or in writing).

Breach of Protocol

19. If a Member considers that they have not been treated with proper respect or courtesy they may raise the issue with the officer's line manager. If direct discussion with the manager does not resolve the complaint it should be referred to the Head of Service or Director responsible for the officer concerned. Breach of the Protocol may give rise to disciplinary proceedings against an officer if the circumstances warrant it.
20. If an officer considers that a Member has contravened the Protocol they should consult their line manager who will if necessary involve the Head of Service or Director. In certain circumstances breach of the Protocol may also constitute a breach of the Members' Code of Conduct. If the breach is sufficiently serious this may warrant a formal reference to the Monitoring Officer as a complaint. Many complaints will be capable of informal resolution. The Monitoring Officer or the Head of Paid Service will assist in this process if necessary. Nothing in this Protocol shall prevent an officer expressing a relevant concern under the Combined Authority's whistleblowing policy.

³ See further the Members' Code of Conduct at Part 5 of this Constitution

⁴ See further the Officers' Code of Conduct at Part 5 of this Constitution

Provision of Advice and Information to Members

21. Members are free to approach officers of the Combined Authority to provide them with such information and advice as they may reasonably need in order to assist them in discharging their role as Member. This can range from a request for general information about some aspect of the Combined Authority's activities to a request for specific advice on a matter.

Information

22. Officers should always endeavour to respond to requests for information promptly and should in any event inform the member if there is likely to be any appreciable delay in dealing with an enquiry.
23. The legal rights of Members to inspect Combined Authority documents are covered partly by statute and partly by common law. The Access to Information Rules in Part 4 of the Constitution explain the position with regard to access to papers relating to the business of the Combined Authority.
24. The exercise of the common law right depends upon a Member's ability to demonstrate a "need to know". In this respect a Member has no right to "a roving commission" to examine any documents of the Combined Authority. Mere curiosity is not sufficient.
25. The information sought by a Member should only be provided by officers as long as it is within the limits of the resources available. For their part, Members should seek to act reasonably in the number and content of the requests they make.
26. It is important for officers to keep Members informed both about the major issues concerning the Combined Authority and, more specifically, about issues and events affecting the area that they represent. Members should be informed about proposals that affect their area and should also be invited to attend Combined Authority initiated events within their area.
27. If a Member asks for specific additional information about a matter, and it appears possible or likely that at a subsequent meeting an issue could be raised or question asked on the basis of the information provided, then the appropriate Member or committee chair should be advised about the information provided.
28. Members may be entitled under the Freedom of Information (FOI) Act 2000 to receive information which falls outside their common law rights based on the "need to know". Officers are encouraged to supply documents to Members without the need for a formal FOI request if it is apparent from the Member's enquiry that any individual would be entitled to receive such documentation. The Combined Authority's Data Protection Officer will be able to advise in

consultation if necessary with the Monitoring Officer on whether any request would fall within the Freedom of Information Act 2000

Advice

29. Officers are responsible for the provision of professional expertise to the Combined Authority and Members are entitled to ask relevant questions and seek advice on available courses of action as they discharge their role as a Member. The response of an Officer to a Member would not usually be shared with other Members without specific agreement, however Members should remember that the Officer's primary duty is to the Combined Authority as a whole and officers will therefore share their advice if they consider it appropriate to do so.
30. Sometimes Officers will need to advise Members that a certain course of action cannot be carried out. Members sometimes assume that this is a case of officers deliberately obstructing the wishes of politicians. In fact this is never the case. Officers are employed to give unbiased professional advice even if it is not what Members want to hear. They do this as much for the protection of Members as for any other reason. However, the mark of an effective officer is that if they do have to give negative advice, this will be accompanied by suggestions as to how Members might achieve some or all of their objectives in other ways. Such officers are invaluable to the Combined Authority.

Members with special responsibilities

31. Combined Authority Members and other Members who hold additional responsibilities (such as the Mayor, Committee Chairs and those with a portfolio of responsibility) will receive additional information from senior officers to help them discharge their responsibilities. This is likely to take the form of briefings on service issues, proposals and policy development. The frequency of briefings will depend on the issues concerned and the requirements of the Member involved, and the content of the informal briefing will remain confidential between the officers and Member concerned.
32. Senior officers will always be fully responsible for the contents of any report submitted in their name and reports will be amended only where the amendment reflects the professional judgement of the author of the report.
33. Members who have additional responsibilities are likely to work more closely with officers but must still respect the impartiality of officers. Officers and Members who work closely together must ensure that they do not publicly give the appearance of personal familiarity.

Members of Constituent Councils with Special Responsibilities

34. Officers of the Combined Authority may also be asked to provide information and advice to appropriate members of Constituent Councils, such as those members with special responsibility for a portfolio or in relation to a specific

project. This is likely to take the form of briefings and the frequency of briefings will depend on the issues concerned and the requirements of the Member involved. If the Combined Authority has assigned a portfolio lead for the subject matter, that Member should be made aware of the information provided.

The Mayor's political adviser

35. The Mayor is able to appoint one political adviser⁵. However, the nature of this role is different to that of other officers of the Combined Authority – see further below re political restrictions.

Confidentiality

36. Members are entitled to access information to enable them to discharge their responsibilities. The Access to Information Rules in Part 4 of the Constitution, set out the basis on which information can be accessed by Members and the public generally, but do not affect any other rights to information arising under standing orders or by law. They also set out the difference between confidential information⁶ and exempt information⁷.
37. Members must ensure that they comply with data protection arrangements and not disclose information given to them in confidence by anyone, or information acquired which they believe, or ought reasonably to be aware, is of a confidential nature, except where:-
- they have the consent of a person authorised to give it,
 - they are required by law to do so,
 - the disclosure is made to a third party for the purpose of obtaining professional advice provided that the third party agrees not to disclose the information to any other person, or
 - the disclosure is –
 - reasonable and in the public interest, and
 - made in good faith and in compliance with the reasonable requirements of the authority.
38. Committee reports which are in the private part of an agenda are to be treated as exempt information unless the relevant committee resolves not to exclude press and public. Members are reminded that the author of the report makes

⁵ See further Article 4 (The Mayor) and Article 12 (Officers) at Part Two of this Constitution.

⁶ Information given to the Combined Authority by a Government department on terms which forbid its public disclosure, or information the public disclosure of which is prohibited by or under an Act or Court Order.

⁷ Information falling within one of the descriptions set out in Part 1 of Schedule 12A of the Local Government Act 1972

the initial decision as to whether or not the papers are to be treated as exempt from public disclosure. The decision as to whether they remain exempt is for the committee.

39. Information and correspondence about an individual's private or business affairs will normally be classed as exempt or confidential.
40. Officers should make it clear to Members if they are giving them confidential or exempt information. If a Member is not sure whether information is confidential or exempt from disclosure, they should ask the relevant officer, and not disclose the information in the meantime.
41. Any Combined Authority information provided to a Member must only be used by the Member in connection with the proper performance of the Member's duties.
42. If a Member receives exempt or confidential information and considers it should be disclosed to another person because it is reasonable and in the public interest to do so then they must first consult with the Monitoring Officer and shall not disclose the information without having regard to any advice given by that officer.

Provision of Support Services to Members

43. The only basis on which the Combined Authority can lawfully provide support services (for example stationery, word processing, printing, photocopying, transport, etc) to Members is to assist them in discharging their role as Members of the Combined Authority. Such support services must therefore only be used on Combined Authority business. They should never be used in connection with party political or campaigning activity or for private purposes.

Correspondence

44. Official letters on behalf of the Combined Authority should be sent in the name of the appropriate officer, rather than in the name of a Member. There are circumstances where a letter sent in the name of a Member is perfectly appropriate, for example, in response to a letter of enquiry or complaint sent direct to that Member. Letters which, for example, create obligations or give instructions on behalf of the Combined Authority should never be sent out in the name of a Member.

Media

45. Communication with the media can be an important part of a Member's workload. In general, Members provide comment and views while officers provide factual information. If a Member is unsure about the circumstances of a particular issue they should contact the appropriate Director or Head of Service concerned.

The Combined Authority's Role as Employer

46. In their dealings with officers, Members should recognise and have regard to the Combined Authority's role as employer. Members should be aware that officers could rely on inappropriate behaviour of a Member in an employment case against the Combined Authority.

Political Activity

47. There are a number of constraints that apply to an officer who occupies a post that is designated as "politically restricted" under the terms of the Local Government and Housing Act 1989⁸. However, there are variations in the extent of restrictions applied - for example, the Mayor's political adviser is an employee in a politically restricted post, but has freedom to become involved with political issues relevant to the Mayor⁹.
48. In summary, politically restricted officers may be prevented from:
- being a Member of Parliament, European Parliament or local authority,
 - acting as an election agent or sub-agent for a candidate for election as a member of any of those bodies,
 - being an officer of a political party or any branch of a political party or a member of any committee or sub-committee of such a party or branch, if their duties would be likely to require them to:-
 - participate in the general management of the party or branch; or
 - act on behalf of the party or branch in dealings with persons other than members of the party;
 - canvassing on behalf of a political party or a candidate for election to any of those bodies,
 - speaking to the public with the apparent intent of affecting public support for a political party, and
 - publishing any written or artistic work of which they are the author (or one of the authors) or acting in an editorial capacity in relation to such works, or to cause, authorise or permit any other person to publish such work or collection - if the work appears to be intended to affect public support for a political party.
49. It is common for party groups to give preliminary consideration to matters of Combined Authority business in advance of such matters being considered by the relevant decision making body. Officers may properly be called upon to

⁸ Sections 1 to 3 of the 1989 Act

⁹ Section 4(5) of the West Yorkshire Combined Authority (Election of Mayor and Functions) Order 2021

support and contribute to such deliberations by party groups provided they maintain a stance which is politically impartial. Support may include a range of activities including briefings for Members relating to their roles, for example chairperson or spokesperson. Officers should be required to give information and advice to political groups on Combined Authority business only and not on matters which are purely of a party political nature. Such advice should be available to all party groups and not solely to the majority group. It is important that the political neutrality of officers is preserved and that group confidentiality is maintained by officers.

50. Usually the only officers involved in attending group meetings will be the Managing Director, Directors or Heads of Service and they will generally leave the meeting after making their presentation and answering questions.
51. Officers are employed by the Combined Authority as a whole. They serve the Combined Authority and are responsible to the Managing Director and their respective Directors and Heads of Service, and not to individual Members, whatever office they might hold.
52. Both Members and officers are subject to their own Codes of Conduct which can be found in Part 5 of the Constitution. This Protocol provides guidance on working relationships between Members and officers. It is essential that both are familiar with the detailed obligations in their respective Codes of Conduct which will prevail in the event of any conflict between the Codes and this Protocol.

Sanctions

53. Complaints about any breach of this Protocol by a Member may be referred to the Monitoring Officer. It should be noted that certain breaches may also amount to breaches of the Members' Code of Conduct.
54. Complaints about any breach of this Protocol by an officer may be referred to the Managing Director or the Monitoring Officer.

Conclusion

55. It is hoped that, by following good practice and securing sensible and practical working relationships between members and officers, the Combined Authority and Mayor can provide one of the cornerstones of success and thereby enhance the delivery of high value quality services to the people of the area. Mutual understanding, openness and respect are the greatest safeguard of the integrity of the Combined Authority, its members and officers.

Document version control

Municipal Year:	2021-22
Version:	1 - 21/22
Document approved by:	<i>The Combined Authority</i>
Date:	<i>24 June 2021</i>
To be of effect from:	<i>24 June 2021</i>