



Ministry of
JUSTICE

legal services
COMMISSION

Code of Conduct for Commissioners

Effective from October 2010

Foreword

This Code of Conduct sets out the standards of behaviour for individual Commissioners at the Legal Services Commission (LSC), includes guidance, principles and rules of conduct and reflects their wider responsibilities.

The Code should be read in conjunction with the key documents which set out the Commission's duties, including:

- all relevant statutory provisions in the Access to Justice Act 1999
- the LSC's *Framework Document* with the Ministry of Justice (MoJ)
- the terms of reference for the Commission or any sub-committees of which Commissioners might be members.

The LSC and the MoJ have approved the Code. The National Audit Office may audit the Commission on its compliance with the provisions of the Code.

The Code applies to all Commissioners. By signing an acceptance of appointment letter, Commissioners agree to act in accordance with the Code.

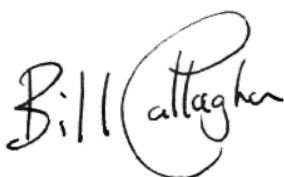
External members of the Commission's committees are expected to abide by relevant parts of the Code, as agreed with the Chair of the Committee(s) for which they are members and stated in their letters of appointment.

Commissioners should familiarise themselves with the Code and are encouraged to seek clarification on any aspect from the Chair.

The Code will be reviewed periodically, and in particular, when the LSC's Framework Document is reviewed. The Commission or the MoJ may propose amendments to it at any time. Commissioners and the Secretary of State and Lord Chancellor will approve any significant changes.



Secretary of State for Justice and Lord Chancellor



Chair of the Commission

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Public service values

The Commission and all Commissioners must at all times:

- follow the *Seven Principles of Public Life* as set out by the Committee on Standards in Public Life which are reproduced at Annex 1;
- observe the highest standards of propriety ensuring impartiality, integrity and objectivity in relation to the management of the organisation and the stewardship of public funds
- maximise value for money by ensuring that services are delivered in the most economical, efficient and effective way, within available resources, and with independent validation of performance achieved wherever practicable. Value for money is not necessarily the lowest price: it is the optimum combination of whole life costs and quality to meet the user's requirement;
- be accountable to Parliament, users of services, members of the public and staff for its activities, the stewardship of public funds and the extent to which key performance targets and objectives have been met;
- act in accordance with Government policy on openness and responsiveness, and comply fully with the Freedom of Information Act 2000.

Relationship with the sponsor department

The Secretary of State and Lord Chancellor is answerable to Parliament for the policies and performance of the Commission, including its use of resources and the policy framework within which it operates.

The *Framework Document* between the MoJ and the LSC sets out the legal, policy, procedural and resources framework in which the LSC will operate and also details the respective roles within the MoJ and the Commission.

Communication with the sponsor Department

Communications between the Commission and the Lord Chancellor will normally be through the Chair except where the Commission has agreed that an individual Commissioner should act on its behalf.

Nevertheless, an individual Commissioner has the right of access to the Lord Chancellor on any matter which he/she believes raises important issues relating to his/her duties as a Commissioner. In such cases the agreement of the rest of the Commission should normally be sought.

The main point of contact between the Commission and the Ministry of Justice on day-to-day matters will normally be the LSC's Chief Executive or another member of staff who is authorised to act on behalf of the Commission.

Responsibilities of individual Commissioners

The overall governance structure and corporate responsibilities of Commissioners are set out in the *Framework Document* and the Commission terms of reference.

Individual Commissioners should act in accordance with their wider responsibilities to:

- ensure that high standards of corporate governance are observed at all times;

- act in good faith and in the best interests of the Commission;
- undertake on appointment to comply at all times with the Code of Conduct and with rules relating to the use of public funds. Any alleged or suspected breach of duty will be dealt with in accordance with the disciplinary procedures for Commissioners;
- ensure that they understand fully the terms of their appointment, and their duties and responsibilities;
- bring an independent judgement to bear on all issues considered by the Commission;
- ensure that information gained in the course of public service is not used for personal gain or for political profit, and that the opportunity of public service is not used to promote their private interests or those of connected persons or organisations;
- avoid giving the Chief Executive instructions which conflict with their duties as the Commission's Accounting Officer; and,
- ensure that they comply with the guidance and requirements in relation to conflicts of interest, including political activities and gifts and hospitality, as set out at Annex 1.

Conflicts of interest

The high standards of integrity expected by the public and Parliament, and the proper conduct of public business require Commissioners to avoid situations in which their duties and other interests conflict, or where there could be a suspicion of a conflict.

Commissioners must disclose all interests which could conflict with their duties, so that appropriate action can be taken to manage or resolve them. The rules on conflicts of interest are at Annex 1.

Personal liability of Commissioners

Although any legal proceedings initiated by a third party are likely to be brought against the LSC, in exceptional cases proceedings (civil or, in certain cases, criminal) may be brought against the Chair or other individual Commissioners. For example, a Commissioner may be personally liable if he/she makes a fraudulent or negligent statement which results in loss to a third party.

Commissioners may be entitled to be indemnified in certain circumstances. The terms of the indemnity, which are consistent with those set out by the Treasury and are broadly comparable with the cover that would be available in commerce or industry, are as follows:

“The Government has indicated that an individual board member who has acted honestly and in good faith will not have to meet out of his/her own personal resources any personal civil liability which is incurred in the execution or purported execution of his/her Commission functions, save where the person has acted recklessly.”

Commissioners are issued with a letter of indemnity in the above terms and may obtain further advice if required from the Legal Director.

The Commission has agreed, in principle, to provide a similar indemnity to external members of its committees, subject to the consent of the Ministry of Justice. Consent will ordinarily be forthcoming provided that committee members have agreed, on appointment, to abide by relevant parts of this Code of Conduct and that the members' actions fall within the terms of the indemnity set out above.

Openness and responsiveness

Commissioners and staff should conduct all their dealings with the public in an open and responsible way and ensure full compliance with the Freedom of Information (FOI) Act 2000, which governs how public authorities should handle requests for information.

The Commission has a statutory duty to publish its annual report and accounts in accordance with Government guidance. Where practical and appropriate, the Commission is expected to hold open meetings and to release summary reports of meetings. It should also seek to follow best practice in making information available to the public, particularly through the internet, and co-operate with other bodies, to place relevant information in the public domain.

The Commission should consult publicly on a wide range of issues in accordance with the Government *Code of Practice on Consultation* which the LSC signed up to voluntarily from 1 November 2008.

The Commission should ensure it can demonstrate that it is using resources to good effect, with propriety, and without grounds for criticism that public funds are being used for private, partisan or party political purposes. It should act consistently with the nature of the LSC's business and the possible need for confidentiality on commercial or other grounds. These obligations are subject to the rights of Parliament and the Comptroller and Auditor General at the National Audit Office to obtain such information.

The Commission should ensure that there is an effective complaints procedure in place that covers complaints of maladministration and be well publicised and easy-to-use. Any complaints received within the organisation should be dealt with in accordance with that procedure. Complaints relating to failure to provide access to information will be dealt with in accordance with the freedom of information internal review procedure.

Disclosure of official information

Commissioners must have regard to Section 38 of the Legal Aid Act 1988 and Section 20 of the Access to Justice Act 1999, which restrict the following:

- disclosure of information provided to the Commission or any court, tribunal or other person or body on whom functions are imposed or conferred by or under the Act
- information relating to the case of an individual seeking or receiving services funded by the Commission as part of the Community Legal Service or Criminal Defence Service.
- Subject to any statutory prohibition on the release of information, Commissioners should conduct all dealings with the public openly and transparently in accordance with the principles of the FOI Act.

Commission papers which are sent to a Commissioner will be marked in accordance with the LSC's protective markings guidance and should be treated accordingly. Commissioners have a responsibility to ensure that all Commission papers and information sent to them are kept safe, and that confidentiality is respected.

Commissioners are expected to be loyal to the LSC and fully committed to its activities. Commissioners are encouraged to debate any issues on which they do not agree with the rest of the Commission, to try to resolve the issue. It may be necessary to revisit the issue at a later point in time or take a majority view. If a Commissioner does not agree with a decision they should not show this publicly, though he/she can continue to argue the point internally, or raise the issue with the Lord Chancellor if necessary.

In order to ensure that Commission policy and information is published in a structured and consistent way, only the Chair or Chief Executive, or those members of staff authorised to act on their behalf, should communicate decisions taken by the Commission or a committee on the Commission's behalf. In reporting Commission business they will take special care to keep confidential any part played in discussion by individual Commissioners, to maintain the convention that any decision is the collective responsibility of the whole Commission or committee.

All Commission discussions should be treated in confidence. Commissioners should resist any request for information from the public or for their personal explanation of how a particular decision was reached.

All requests for information should be notified to the CEO's Office and Governance team who will deal with them in accordance with the FOI Act.

Evidence to Select Committees

The Chair and staff of the Commission may be called to give evidence to the Justice Committee, the Public Accounts Committee and in particular circumstances to any other Committees of the House, which may decide to take evidence on the specific activities of the LSC.

Commissioners are free to decide to give evidence without being specifically invited. They should give evidence in accordance with the Cabinet Office guidance *Departmental Evidence and Response to Select Committees*.

Commissioners wishing to give evidence should speak to the Chair and if necessary, other Commissioners about the handling of any oral or written evidence they wish to submit. They should make clear whether they are giving evidence on behalf of the Commission or in a personal capacity.

Whistleblowing and breach of duties or the Code

The *Staff Code of Conduct* sets out the whistleblowing procedures for staff, which are in accordance with the Public Interest Disclosure Act 1998.

Like staff, Commissioners are encouraged to raise any issues which cause concern, where they act in good faith and through the appropriate channels.

Any Commissioner or member of staff who suspects that a breach of duty may have been committed by any Commissioner, or is informed of such by a third party, has an absolute duty to report the matter immediately to the Chair of the Commission. The Chair should then report the matter immediately to the Lord Chancellor.

Any disclosure of a breach of duty by the Chair should be made to the Lord Chancellor, via the Head of the Sponsorship and Performance Unit at the Ministry of Justice.

Any disclosures of improper conduct will be dealt with in accordance with the disciplinary procedures for Commissioners.

Appendix A

Rules on handling conflicts of interest¹

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¹ The statutory provisions under paragraphs 6 and 7 of Schedule 1 of the Access to Justice Act 1999 provide for Commissioners' declaration of interests.

Introduction

A conflict of interest is a situation where there is a conflict, a risk of conflict or the appearance of a conflict, between an individual's personal interests (financial or otherwise) and the interests of the Commission, to the extent that he/she might not act at all times in the best interests of the Commission. Conflicts of interest should always be considered in terms of how a reasonable third party might perceive the situation.

The Lord Chancellor may appoint Commissioners with particular areas of expertise and knowledge. Having such expertise within the Commission is invaluable but it means there may be times when a conflict of interest might arise. This will mainly apply to those Commissioners appointed for their expertise in the provision of services that the Commission can fund as part of the CLS and CDS and the work of the courts. However, it is possible for a conflict of interest to arise for any Commissioner.

The Commission aims to minimise the potential for conflicts arising between Commissioners' private or business interests and their public duties.

Commissioners must take steps to ensure that any conflict of interest which might arise relating to their work does not influence, nor appear to affect, any decisions or actions taken by the Commission. In addition, Commissioners must not make use of their appointment to the Commission to further their private interests, or receive gifts, hospitality or benefits of any kind from a third party which might be seen to compromise their personal judgement or integrity.

The CEO's Office and Governance team can provide advice on handling conflicts of interest.

Provisions relating to conflicts of interests

The common law requires that:

- members of public bodies should not participate in the discussion or determination of matters in which they have a direct financial interest; and
- when an interest is not of a direct financial kind, Commissioners should consider whether participation in the discussion or determination of a matter would suggest a real danger of bias. This should be interpreted in the sense that an individual Commissioner might not take a fully objective opinion on the matter or he/she (or a close family member) might be more affected by the decision than most. This would cover, for example, a decision to initiate a policy that might lead to a firm connected to a Commissioner gaining additional funding.

Before appointing a person to the Commission, the Lord Chancellor satisfies him/herself that that person has no such financial or other interest as is likely to affect prejudicially the exercise or performance of the functions of a Commissioner.

How to make general declarations of conflicts of interests

The Chair and other Commissioners should declare any personal or business interests that may conflict with their responsibilities as Commissioners.

Commissioners should use the form at Annex 2 to disclose conflicts of interests and any relevant financial information, such as any sponsorships or financial or material support that Commissioners or their close family receive from any organisation falling within the LSC's sphere of statutory responsibility (known as 'related party transactions').

Commissioners should also disclose any interests of which they are aware about close family members and persons living in the same households as the Commissioner. In addition, Commissioners should consider whether they need to disclose relevant interests of other persons or organisations which members of the public might reasonably think could influence the Commissioner's judgement.

The CEO's Office and Governance team maintains the register of interests and requests updates to Commissioners' declarations of interests on a regular basis. Commissioners are required to inform the CEO's Office and Governance team of any changes to their declarations as and when changes occur so that the register may be updated accordingly. The Commission's register of interests is open to the public via the LSC website.

How to record a conflict in relation to a meeting

Schedule 1 paragraph 7(1) of the Access to Justice Act 1999 sets out the rules on recording conflicts of interest.

Commissioners should declare as soon as practicable at, or preferably before, a meeting if they have any conflict of interest about a matter being considered. A Commissioner need not attend a Commission meeting in person to make a disclosure of a conflict of interest if he/she takes reasonable steps to secure that the disclosure is made by a notice which is brought up and read out at the meeting.

The nature of the disclosure will allow the Chair of the meeting and others present to determine whether the Commissioner is able to participate in the discussion or any decisions about the matter.

The conflict of interest and the level of participation in discussions by the Commissioner will be recorded in the minutes of the meeting.

A declaration relating to a Commission meeting by a Commissioner will usually refer to the following:

- he/she is a person with whom a contract may be entered into, or to whom a grant, loan or other payment may be made, by the Commission; or
- he/she is a member of a specified body with which a contract may be entered into, or to which a grant, loan or other payment may be made, by the Commission; or
- he/she is connected to a firm which is involved with a particular project or initiative or will be affected by a particular policy.

'General disclosures' such as this will be recorded on a declarations register by the CEO's Office and Governance team and will be regarded as a sufficient disclosure of his/her interest in relation to the matter on any subsequent occasions. It will only need to be updated if the situation changes.

In addition to the general disclosures mentioned above, Commissioners are also under a duty to declare to any others as appropriate any conflict of interest which arises in the course of their work whenever it becomes relevant, for example at committee meetings, during discussions or email correspondence. A general disclosure of interests is not a substitute for this.

Guidance for resolving potential conflicts of interest

The guidance below refers particularly to Commissioners who are lawyers (solicitors or barristers) but the general principles are applicable to any conflict of interests.

Lawyer Commissioners providing services funded as part of the CLS or CDS

Commissioners are not prohibited from providing services funded as part of the CLS or CDS in their private capacity during their term of appointment to the Commission.

Discussions on general policy

Commissioners would not normally be expected to withdraw from discussions on general policy (e.g. concerning the development of the terms of various legal services contracts and/or remuneration) even if they, or their firm or other organisation, have been awarded or seek a contract from the LSC or receive monies from the same. Their particular expertise on these issues would be valuable to the Commission's discussions. If in doubt it is always helpful to consider how those outside the organisation would perceive the decision.

Awarding contracts

If a Commissioner has any financial or other interest in an organisation being considered for a contract, either directly or indirectly, he/she should withdraw from the deliberations completely and the matter would be recorded in the minutes. Examples of direct and indirect interest could be:

- if the Commission was considering whether to award a contract to a competitor of a particular Commissioner or of his/her firm or company or any other organisation (direct interest); or
- if the Commission was considering whether to award a contract to a company, firm or other organisation in which a Commissioner's relative, spouse or personal partner has a financial or other interest (indirect interest);
- if the Commission was considering awarding a contract to a company, firm or other organisation in a particular multi-party action or very high cost case or public interest case and a Commissioner had some involvement in the particular action in his/her own professional capacity (direct interest).

Personal involvement in cases or issues

Occasionally, lawyer Commissioners will be involved as a practitioner in individual cases or issues that arise during the day-to-day work of the Commission. This may be in their role as a member of, for example, the Multi-Party Action Committee or the Public Interest Advisory Panel. Where a matter relating to one of these committees is raised at a Commission meeting, a Commissioner who has had involvement in the case should declare a potential conflict of interest.

The Chair will make an assessment according to its circumstances. A Commissioner may only participate fully when such cases or issues are discussed at Commission meetings where there is not considered to be a real danger or perception of bias. Where this is the case, the Commissioner will be required to declare an interest and withdraw from the discussion.

Attending a committee of the Review Panel

It is inadvisable for any lawyer Commissioner to attend a funding review committee or costs committee as an appellant or as a representative of an appellant. It could be perceived that their presence before the committee could unduly influence the adjudication of the committee. However, it is acceptable for Commissioners to provide written submissions and/or opinions before the committee and/or arrange for someone else from his/her firm to attend on behalf of the firm or the firm's client.

Membership of the Commission's committees

On appointment to the Commission, any Commissioners who are external members of a Commission committee will be asked to resign from the committee. He/she may be eligible for reappointment to the committee in their role as a Commissioner.

Executive membership of policy-making groups

There is also a requirement by the Secretary of State and Lord Chancellor for all Commissioners to resign from membership or offices of policy making groups involved in the delivery of legal services if their role could involve them endorsing a policy of that body in contradiction to a policy endorsed by the LSC.

Advice/prosecution of proceedings against the Commission

Lawyer Commissioners should not accept instructions to advise or represent parties involved in any proceedings taken against the Commission. Should they find themselves in such a position, they should withdraw from the case. This also applies to any Commissioner who is instructed or approached to advise on any projects that have been authorised by a particular Commission committee.

Professional obligation on lawyer Commissioners to report any serious breach of conduct

The Commission recognises that, in certain circumstances, lawyers appointed to the Commission may be under a professional obligation to report to their professional bodies any misconduct of other solicitors or barristers that they may learn of during their work as Commissioners.

The Commission will not interfere with these professional obligations. However, no Commissioner may release Commission and/or committee papers without the Commission's express consent. The Solicitors Regulation Authority and the Bar Standards Board have both been consulted on this requirement and have expressed the following views:

- a) The Solicitors Regulation Authority has confirmed that they cannot foresee any difficulty with the Commission's requirement that members may not release Commission and/or Committee papers without the Commission's express consent. They would not, therefore, be in breach of Principle 20.06 of the *Solicitors Code of Conduct 2007*.
- b) The Bar Standards Board has confirmed that it would be content for the Commission to report any misconduct by a barrister which came to light. In these circumstances, an individual barrister Commissioner would be under no individual duty to report such misconduct him/herself.

Gifts and/or hospitality

Commissioners should not accept any gift, hospitality or services from anyone which would, or might appear to, place him/her under an obligation.

All offers of gifts, hospitality or services should be disclosed. If in doubt, guidance may be sought from the CEO's Office and Governance team who will advise whether any offer may be accepted or not in accordance with these rules.

Details of the offer are recorded in a register of gifts and hospitality maintained by the CEO's Office and Governance team. The register includes: the name of the Commissioner receiving the offer or invitation; details of the gift, hospitality or service; its originator; the estimated value; whether the offer was

accepted or not and, for gifts, its ultimate destination. The register may be requested under the Freedom of Information Act 2000.

Gifts and hospitality may be accepted only in the circumstances set out below but will still need to be reported and recorded in the register:

- isolated gifts of a trivial character or inexpensive seasonal gifts, such as calendars;
- conventional hospitality, provided it is normal and reasonable in the circumstances.

What is normal and reasonable will largely depend on the extent to which a Commissioner is personally involved. There is no objection to the acceptance of, for example, an invitation to the annual dinner of an organisation (like the Law Society) with which the Commission has regular contact, or to working lunches in the course of official visits or business relationships but it must not be frequent, regular or lavish. At all times, Commissioners must make clear that gifts and hospitality are not accepted in return for, or in anticipation of, any action or inaction.

Political activities

Commissioners, whether full-time or part-time, are expected not to occupy paid party political posts or hold particularly sensitive or high profile unpaid roles in a political party.

Subject to the above, part-time members are free to engage in political activities, provided that they are conscious of their general public responsibilities and exercise proper discretion, particularly in regard to the work of the Commission. On matters directly affecting that work, they should not make political speeches or engage in other political activities.

The above restrictions do not apply to Commissioners who may be local councillors. However, Commissioners should take particular care during any local election or referendum campaign not to compromise the political impartiality of the Commission and to ensure that public resources are not used for party political purposes. Commissioners should comply with any elections guidance issued by the Cabinet Office.

All Commissioners should be free to maintain associations with Trade Unions, Co-operative Societies, trade associations, professional bodies etc., to the extent that such associations do not conflict with the interests of the Commission.

Any Commissioner who is in any doubt about the application of these rules, or about the propriety of any political activity, should seek guidance from the Chair, who will if necessary consult with the Lord Chancellor.

Public appointments

It is necessary to prevent conflicts of interest arising from the acceptance of outside appointments during the tenure of appointment as a Commissioner. In general, the holding of a public appointment should not restrict Commissioners from taking up employment after their appointment to the Commission. However, some employment restrictions do apply to Commissioners during their term of appointment, for example membership of the House of Commons.

Commissioners are obliged to seek advice from the Chair if they are in any doubt about acceptance of an outside appointment during or after their appointment to the Commission.

Annex 1 – The seven principles of public life

The seven principles of public life

Selflessness

Holders of public office should take decisions solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisation that might influence them in the performance of their official duties.

Objectivity

In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty

Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interests.

Leadership

Holders of public office should promote and support these principles by leadership and example.

Annex 2 – Declaration of interests form

Commissioners are expected to use this form to provide details of all direct or indirect pecuniary and non-pecuniary interests². This is because, if undeclared, such interests might be perceived by a third party as affecting your duties. For the avoidance of doubt, you should provide details of all interests; though note that only those that are relevant to your work at the LSC will be disclosed in the register of interests.

You should also declare interests in relation to close family. Close family includes – but is not confined to – a spouse, personal partner, parent, child (minor or adult), brother, sister or the spouses or personal partners of any of these, ie. people who could influence or be influenced by you in any dealings with the LSC.

If you are in doubt about whether to disclose a particular interest, or have any other queries in relation to this, please seek advice from the CEO’s Office and Governance team.

A register of interests is published on the LSC website. Please complete this form and return in hard copy or electronically from your personal email.

1. Name

2. Directorships

Please give details of any remunerated or non-remunerated directorships, i.e. directorships of companies or other organisations.

Name of organisation

Nature of organisation

Position within organisation

² Indirect pecuniary interests arise from connections with bodies/organisations which have a direct pecuniary interest or from being a business partner of, or being employed by, a person with such an interest. Non-pecuniary interests include those arising from membership of clubs and other organisations.

3. Employment

Please give details of any employment – that is any remunerated employment, offices held, professions etc other than held with the LSC. Please also declare any membership of a Lloyds syndicate. If you work for an LSC contracted firm, please provide details of any contract(s) held.

Name of organisation Nature of organisation Position within organisation
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4. Appointments to office

Please give details of any voluntary and/or public offices held.

Name of organisation Nature of organisation Position within organisation
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5. Financial relationships

Please give details of any sponsorships or financial or material support that you receive from any organisation falling within the LSC’s sphere of statutory responsibility.

The LSC is required under the Financial Reporting Standard 8 of the Accounting Standards Board to include in its annual accounts details of payments made to related parties, including Commissioners and their respective firms/organisations. These declarations are defined as material transactions with ‘related parties’. Please provide details if you or a close family member are connected with an organisation that receives funds from the CLS or CDS or the administration fund. Related party transactions are declared in the annual accounts.

Name of related party and relationship Details of financial relationship Contact name and phone number
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6. Shareholdings

Please identify any institution where you or a close family member hold a total investment or other interest which has a nominal value over £25,000 or 5% or more of the issued shares or securities of that institution, or of any class of such shares or securities.

Please also provide details if you or a close family member have a controlling interest or have voting rights for another person in a representational capacity (eg. as a trustee). You should also declare shareholdings of between 1% - 5% of the issued share capital if:

- taken together a Commissioner and his/her spouse, personal partner or relative had enough shares which would give them a controlling interest in any company; and/or
- individually, a Commissioner or his/her spouse, personal partner or relative had between 1% - 5% but had the voting rights for another (e.g. as a trustee).

Name of organisation Owner(s) of shareholding Details of shareholdings
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7. Political activity

Please give details of any significant political activity that you are involved in (e.g. holding office in a political party).

8. Other interests

Please give details of any other relevant interests, including significant interests of close family members, i.e. ones which might influence your judgment, deliberation or action as a Commissioner, or which might be perceived by a reasonable member of the public as doing so.

9. Signature and date

Signature:

Date:

For further information contact:

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