



POLICE PENSION BOARD



NIPB POLICE PENSION BOARD MEMBERS' CODE OF CONDUCT

Version 2 – May 2025

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Alternative Formats

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FOREWORD

This Code sets out the standards of practice expected from all Members of the Northern Ireland Police Pension Board (**PPB**). This document sets out the Code of Conduct for PPB Members which should govern their conduct during their term of appointment as a PPB Member.

PPB Members are responsible for ensuring that they fulfil their statutory duties under the *Police Pensions Regulation (Northern Ireland) 2015* and *Police Pensions (Remediable Service) (Amendment) Regulations (NI) 2024* along with other relevant legislation.

The purpose of the Code is to:

- establish and promulgate a common set of ethics, values and standards of integrity for all PPB Members.
- support the development of exceptional standards of professional practice; and
- promote and maintain confidence and trust in PPB Members.

In carrying out their responsibilities PPB Members, like others who serve the public, should follow the Seven Principles of Public Life as set out by the Cabinet Office. These guiding principles should inform all Members' actions and decisions when discharging their public duties.

As a Member of the PPB, it is your responsibility to ensure you are familiar with and comply with all relevant provisions of this Code.

Any queries regarding the application of this Code should be directed to the Chairperson of the PPB.

1. OVERVIEW

1.1 SEVEN PRINCIPLES OF PUBLIC LIFE (NOLAN PRINCIPLES)

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 organisations 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 the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest 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 interest.

Leadership

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

1.2 Scope

This Code is binding on all Members of the PPB and requires that each person is familiar with it. For the purposes of this Code, the term Member(s) includes all Independent Advisors, Police Service of Northern Ireland (**PSNI**) Members, and Police Federation Members, except where indicated otherwise.

1.3 Review of Code

This Code of Conduct was formally reviewed and updated in May 2025. The Board will undertake periodic reviews of this Code to ensure it continues to meet the Board's needs and remains appropriate.

1.4 Breach of Code

If an incident occurs where there may be a breach of the Code, or if there is an allegation of a breach, it will be referred to the Chairperson of PPB, in the first instance, for informal resolution. If informal resolution is not appropriate or does not prove possible, the incident or allegation will be referred to the Department of Justice.

2 GENERAL CONDUCT

2.1 Allowances

You must comply with the rules set by the Northern Ireland Policing Board (the **Board**) regarding remunerations, allowances and expenses. It is your responsibility to ensure compliance with all relevant HM Revenue and Customs' requirements concerning payments, including expenses.

2.2 Gifts and hospitality

As a result of carrying out official PPB duties, PPB Members may on occasion be offered gifts/hospitality from third parties. Before accepting, PPB Members should consider if it would be acceptable to the public for such a gift/hospitality to be received. Where a PPB Member, having considered this issue accepts a gift/hospitality, it should be notified immediately to the PPB Chairperson.

The Gifts and Hospitality Register will be periodically reviewed by the Board's Audit and Risk Management Committee.

2.3 Registration of Interests

The PPB Secretary will maintain a Register of Interests for each Member. It is your responsibility to ensure any personal or business interests, financial or otherwise, which the public might reasonably think could influence your judgment, is declared on the Register. You must ensure that your entry in the Register is accurate and up to date.

You should also declare any relevant past interests or potential future interests where the public could reasonably perceive these to influence your judgment.

You will be requested to notify the PPB Secretary of all such registerable interests. Any subsequent changes or additions to your registration should be notified immediately in writing to the PPB Chairperson. The PPB Chairperson will ask Members to confirm the accuracy of the Register of Interests every six months.

You must declare a personal or business interest, financial or otherwise, immediately upon becoming aware of the potential conflict or before discussion on an agenda item begins. Interests of immediate family members and persons living in the same household should also be declared. You should consider whether you need to disclose relevant interests of other connected persons or past and potential interests which might be perceived to affect your consideration of any matter.

As a general rule, you should not take part in, and normally should not be present for, discussions or decisions if you have a personal or business interest, financial or otherwise, in the matter under consideration. In determining whether withdrawal from the proceedings is appropriate, the following test should be applied: -

Would a member of the public, knowing the facts of the situation, reasonably think that their presence could influence the judgment of the PPB Member or other Members present.

2.4 Members' Interests

You must comply with the PPB rules on handling conflicts of interest, as set out in the PPB Members Conflict of Interest Policy. As a minimum, these require you to declare any private interest that may, or may be perceived, conflict with your PPB duties. In general, all financial interests should be declared.

You must ensure that no conflict arises, or could reasonably be perceived to arise, between your public duties and your private interests- financial or otherwise.

The rules will also require you to remove yourself from the discussion or determination of matters in which you have a financial interest. In matters in which you have a non-financial interest you should not participate in the discussion or determination of a matter where the interest might suggest a danger of bias.

The following procedures are aimed at ensuring that any potential conflicts are identified at an early stage or declared during the conduct of business and appropriate action is taken to resolve them.

2.5 Use of Official Information

You must not misuse information gained in the course of your public service for personal gain. Members of the PPB should be aware of the provisions of the Official Secrets Acts 1911 to 1989. Unauthorised disclosure of any information gained in the course of your discharge of PPB duties or its use by you or others for personal advancement would be regarded as a grave breach of trust.

All members must comply with the requirements of Data Protection Legislation. You must not disclose any information which is official sensitive/confidential in nature, or which is provided in confidence without authority. This duty continues to apply after you have left the PPB.

All information, data and correspondence that you have access to, as part of your PPB duties, should be treated with an appropriate level of sensitivity irrespective of any Protected Marking that may or may not be in place. Your work with the PPB will be subject to the *Freedom of Information Act 2000* and Data Protection Legislation.

2.6 Employment and Appointments

If you take up new employment or appointments during your term of office, you must inform the Chairperson of the Board.

3 RESPONSIBILITIES AS A PPB MEMBER

3.1 Responsibilities of the Chairperson

- Represent the PPB in contact with a range of stakeholders including Employers, Members, NIPB Resource Committee and the Pension Regulator.
- Ensure that all PPB Members, when taking up office, are fully briefed on the terms of their appointment, and on their duties and responsibilities.
- Chair meetings of the PPB ensuring that these are conducted in an expeditious manner.
- Ensure that the PPB operates as an effective and efficient mechanism for governing the Police Pension Scheme.
- Promote agreement between the bodies and individuals represented on the PPB by working to create mutual understanding and by facilitating action to resolve differences in the event of disagreement.
- Identify the PPB's stakeholders and ensure that there is effective communication with, and feedback from, stakeholders; and
- Liaise with the NIPB Resources Committee and NIPB officials to report on progress and delivery and make any recommendations. To be available to meet with the NIPB Resources Committee on request and to present an annual report.

3.2 Responsibilities towards the Secretariat (Board Officials)

Respect and courtesy should be shown to the Board's Secretariat at all times, and it is expected that the Secretariat will also show the same consideration.

3.3 Participation of Members

PPB Members have a general duty to act in the interest of the PPB and Police Pension Schemes at all times, avoiding conflicts between personal, work and public interests.

In fulfilling their statutory responsibilities PPB Members must at all times:-

- Observe the highest standards of propriety involving impartiality, integrity and objectivity in relation to stewardship of public funds and management of the Police Pension Schemes.
- Ensure that dealings with the public are in accordance with the principle of Openness (see paragraph 2).
- Act with full regard to the duties and obligations expected of a PPB Member including respect for equality, human rights and diversity.

3.4 Misuse of Position

PPB Members have a duty to maintain the reputation of the Police Pension Board through fair, open and impartial dealings with external contacts. Therefore, PPB Members should: -

- 1) conduct themselves in relation to whosoever they may come into contact in their capacity as PPB Members in the same manner as they would expect to be dealt with themselves.
- 2) not conduct themselves in such a manner as to bring the PPB into disrepute.
- 3) not use their position to promote their private interests.
- 4) not use their position to secure privileges or exemptions for themselves or others.
- 5) not assert or imply to any police officer of whatever rank that membership of the PPB carries with it any advantage or entitlement not enjoyed by other citizens.
- 6) be careful not to inadvertently conduct themselves in such a manner as to appear to be acting in contravention of (1) – (5) above; and
- 7) act in their individual employments and having contact with government or police officers must not purport to be acting in their capacity as PPB Members.

3.5. Confidentiality

- No PPB Member shall disclose to any person, other than another PPB Member or an authorised NIPB official, any information, whether written or verbal or electronically recorded, generated or received by the PPB Member

in his/her capacity as such which breaches the level of confidentiality placed on the information by the PPB or which would be injurious to the interests of the PPB or unfairly prejudicial to any other body or person without the authorisation of the Chairperson of the PPB.

- No PPB Member shall disclose to any person, other than another PPB Member or an authorised NIPB official, the contents of any document or any part thereof or an electronic record bearing any of the protective markings listed in the NIPB Information and Data Security Guide annexed hereto without the authorisation of the Chairperson of the PPB.
- It is the duty of PPB Members to safeguard all documents (including copies thereof) furnished to them. It is also the duty of PPB Members to take appropriate steps to safeguard equivalent electronic records.
- PPB Members who do not adhere to, or do not give, an undertaking on appointment that they will comply with the requirements of confidentiality will limit the ability of the PPB to conduct its business and limit the information made available to them and other PPB Members. It may also result in exclusion from attendance at confidential briefings.

3.6 Raising a Concern

The Board is committed to fostering an environment where PPB Members and officials feel able to raise concerns they may have and to ensuring that any concerns raised are carefully listened to and prompt action is taken.

As a Member of the Board, if you have a concern about possible issues or irregularities within the Board, this should be raised in the first instance with the Chairperson. The Chairperson shall deal with such concerns, at all times respecting as far as possible the confidentiality of the identity of the Member who disclosed such concerns, in an appropriate manner that ensures a meaningful follow-up of matters raised.

In the event that the matter has not been resolved by the Chairperson or where the matter relates to the Chairperson, concerns should be raised directly with the Board's Chief Executive who will advise the Board's Audit and Risk Committee.

If you find evidence of non-compliance with any statutory obligations applying to the Board, you should immediately bring this to the attention of your fellow Members with a view to having the matter rectified. The matter shall also be brought to the attention of the Board's Audit and Risk Management Committee by the Chairperson indicating that (i) the consequences of such non-compliance and (ii) the steps that have been or will be taken to rectify the position.

Where Members consider that independent professional advice is required, they may obtain such advice at a reasonable cost to the Board, subject to approval by the Chairperson and adherence to the Board's procurement procedures.

4 ARRANGEMENTS FOR REVIEW

Any queries regarding the application of this Code should be directed to the PPB Secretary.

This Code will be reviewed every two years, to ensure it continues to meet the PPB's needs and to identify any areas where it could be improved. PPB Members will be consulted about proposed changes and a revised copy of the Code issued.

5 RELATED POLICIES AND PROCEDURES

| REF | TITLE |
|--------|---------------------------------|
| 427829 | PPB Conflict of Interest Policy |

