

Archwilydd Cyffredinol Cymru Auditor General for Wales

Code of conduct for Board members

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Purpose

This Code sets standards for the conduct of Board members. It reinforces the core values and standards that underpin the Wales Audit Office's work and is a reference point for decisions and courses of action in carrying out the Board's statutory and professional responsibilities.

Scope and application

- Board members are responsible for ensuring that they are familiar with the provisions of this Code and that they comply with them. Members are required to:
 - confirm annually that they comply with the Code's provisions; and
 - review their compliance with the Code regularly, particularly in light of any changes in their personal circumstances, reporting any changes to the Board Secretary.
- This Code defines responsibilities but cannot address all the issues that members may face during their term of appointment. Members need to apply common sense and careful judgement and address any requests for further guidance or clarification to the Chair in the first instance. Members may also choose to consult their own legal advisers and, on financial or commercial matters, seek advice from other relevant professionals.
- The Code may be updated from time to time. The Board will approve any amendments.
- Failure to operate within the terms of the Code may result in the termination of an appointment and, in the case of employee members, disciplinary action.

Principles

- The work of the Auditor General and the Wales Audit Office is concerned with propriety and accountability in public services. The organisation is therefore under a particular obligation to maintain the highest standards of professional and personal conduct.
- 7 Members must adhere to the seven Principles of Public Life:
 - (a) selflessness holders of public office should act solely in terms of the public interest.
 - (b) 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 declare and resolve any interests and relationships.
 - (c) objectivity holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
 - (d) 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.
 - (e) 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.
 - (f) honesty holders of public office should be truthful.

- (g) 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.
- In addition, members must conduct themselves in accordance with the Wales Audit Office's values and behaviours.

The Ethical Standard

- In order for the Auditor General's work to be professionally and publicly credible, it must comply with the Ethical Standard promulgated by the UK's Financial Reporting Council. Board members have significant control over the resources that the Auditor General uses to perform audit work and it is essential that they also comply with the Standard.
- The Standard comprises two overarching principles covering integrity, objectivity and independence supported by ethical provisions setting out the arrangements that need to be in place for compliance purposes. This Code is designed to satisfy those requirements.
- Importantly, when considering whether ethical outcomes have been met members should evaluate their actions against the third-party test i.e. is it probable (more likely than not) that an objective, reasonable and informed third party would conclude that integrity or objectivity (and therefore independence) is compromised.

Personal conduct

General

- Board members are expected to comply with the Wales Audit Office's policies and procedures where relevant. They:
 - must understand and respect the remits of the Auditor General and the Wales Audit Office;
 - must discharge their responsibilities reasonably and according to the law;
 - must not use their position in the Wales Audit Office or its resources to deal with private matters or to pursue private interests;
 - must make decisions solely in terms of the public interest and not to gain financial or other benefits for themselves, their family or their friends;
 - must not place themselves under any financial or other obligation to individuals or organisations that might influence them in the performance of their duties;
 - must act impartially and objectively and not prejudge an issue;
 - must avoid anything that could reasonably be perceived as nepotism or favouritism in their dealings with other members, staff or other contacts;
 - must not discriminate unfairly on grounds of ethnic or racial origin, disability, religion, age, sexual orientation, gender, pregnancy or maternity, part-time / fulltime status, marital status or trade union activities;
 - must demonstrate professional competence and expertise in their work,
 maintaining and developing their knowledge and skills as required.

- Members must declare any interests relating to their public duties in accordance with this Code of Conduct and the Board's terms of reference, and they must take steps to resolve any conflicts arising, in a way which protects the public interest.
- Where this Code requires information to be disclosed to the Chair, in the case of the Chair, they should report the information to the Chair of the National Assembly's Finance Committee. If the Chair fails to report such a matter to that Committee, the Auditor General should make the report as Accounting Officer.

Compliance with codes of conduct for professional bodies

- Members must uphold the codes of conduct of any professional bodies of which they are a member.
- Members must report to the Chair any investigation of allegations of misconduct or malpractice or the results of any disciplinary procedures or reprimands issued by professional bodies.

Personal and domestic relationships

- 17 The Auditor General's objectivity and independence may or may be perceived to be compromised if a Board member's immediate or close family member holds a position of influence with an audited body. In such circumstances:
 - (a) members are required to report any immediate family, close family and other personal relationships involving an audited body which they consider might create a threat to the auditor's objectivity or a perceived loss of independence;
 - (b) the relevant audit engagement directors will be notified promptly of any such relationships, will assess the threat and will apply appropriate safeguards to eliminate it or to reduce it to an acceptable level.
- 18 Except for giving biographical details in communications such as CVs, members must not make use of their official position to further their private interests or that of family, friends or associates.

Disclosure of court orders, official enquiries, investigations, licence refusals etc

- 19 Members should inform the Chair if they:
 - (a) are subject to a court order instigated by a regulatory body;
 - (b) are subject to an official enquiry by a financial, professional or other business authority: or
 - (c) have been refused or restricted in the right to carry on any trade, business or profession for which a specific licence, registration or other authority is required.

Bankruptcy and significant financial difficulties

- Members must not participate in activities which might severely damage their financial standing. Members must inform the Chair if:
 - (a) they are subject to a judgement by a UK court about a debt or an attachment of earnings order;

- (b) they are declared bankrupt or served with a bankruptcy petition (or the equivalent in Scottish law);
- (c) they enter into compromise arrangements or trust deeds with creditors;
- (d) they experience significant financial difficulties.
- 21 Members will be required to give a full statement of their case to establish whether their position is likely to prejudice the proper and effective performance of their duties.
- A member who becomes bankrupt (or the equivalent in Scottish law) or who has made arrangements with creditors may be removed from the Board in accordance with the provisions of the Public Audit (Wales) Act 2013.

Criminal offences and civil actions

- 23 Members must inform the Chair if they are arrested and refused bail, or if they are convicted by a court of any criminal offence (except a traffic offence for which the penalty does not include imprisonment or disqualification from driving).
- Members are also obliged to report to the Chair any civil actions resulting from professional or business activities where a court has found against them. Action may be necessary depending on individual circumstances.

Gifts, hospitality and entertainment

- The Wales Audit Office engages with a wide variety of suppliers and other bodies in the course of its business and members may be faced with occasions where gifts or hospitality are offered or provided. The Auditor General also audits transactions with a wide range of such bodies. The gifts and hospitality policy applies in these circumstances.
- The provisions of this section do not apply to activities that are not related to the Wales Audit Office. It is, however, each member's responsibility to ensure that they do not accept any gifts or hospitality that lead to a conflict of interest with the functions of the Auditor General or Wales Audit Office.

External communications

- 27 Members should not make any reference to their work with the Wales Audit Office when speaking in public or in their use of social media, such as Twitter or LinkedIn, if there is any risk of the content being regarded as prejudicial.
- Members must make no public comment about the Wales Audit Office or its work without prior approval from the Chair (this excludes matters relating to the exercise of the Auditor General's audit and inspection functions where public comment is a matter for the Auditor General).
- Members may write or contribute to books or articles that are not related to the work of the Auditor General and the Wales Audit Office. Their content must not call into question the integrity, objectivity or impartiality of the Auditor General.
- 30 Members are permitted to write or contribute to books or articles related to the work of the Auditor General and the Wales Audit Office provided that this is discussed and agreed with both the Auditor General and the Chair. Members are responsible for

- checking whether the subject of a book or article relates to the work of the Auditor General.
- Board members will consult the Chair and / or Auditor General if approached directly by the media. In all cases:
 - (a) the Auditor General is the final arbiter about what will be disclosed in respect of audit-related matters;
 - (b) the Chair is the final arbiter about what will be disclosed in respect of the functions of the Wales Audit Office.
- Contact with the media should be channelled through the Communications Team and it is essential that they are consulted before consenting to an interview. In most cases, a Communications Officer should be present at any interview.

Confidentiality

- The Wales Audit Office is committed to demonstrating openness and transparency in the way it operates and how it communicates with the public. However, members must be careful in their handling of information obtained in the course of their duties. Members must not disclose, beyond the proper channels of reporting, any information about audited bodies, the Auditor General or the Wales Audit Office, obtained as a result of their work. They must pass requests for information to the Board Secretary who will liaise with the Information Officer as appropriate.
- 34 The Wales Audit Office treats breaches of confidentiality or information security seriously. Unauthorised access or supply of information to others could lead to the termination of an appointment and to a criminal prosecution under data protection legislation.
- Members have a duty to protect the security and confidentiality of all information, whether paper-based or electronic. They should take special care when transferring official information, including when it is being carried on public transport.
- Documents generated by the Wales Audit Office and used during the course of the Board's work remain the property of the Wales Audit Office and members must return them together with any other property belonging to the Wales Audit Office at the end of their appointment.

Political activities

- 37 Under Article 10 of the European Convention on Human Rights, Board members have a right to freedom of expression, including political expression. It is a qualified right that can be restricted in certain circumstances, including to protect the reputation or rights or others or to prevent the disclosure of information received in confidence.
- The Auditor General is independent, and it is essential that the Wales Audit Office is, and is seen to be, free from bias, including political bias.
- The Public Audit (Wales) Act 2013 disqualifies the following office holders from also being a member of the Wales Audit Office:
 - a member of the National Assembly;
 - anyone recommended, nominated or appointed by the Crown, the National Assembly or the National Assembly Commission;
 - a member of the House of Commons or the House of Lords;

- a member of the Scottish Parliament;
- a Member of the Northern Ireland Assembly.
- 40 In addition, Board members:
 - may not be a member, or a candidate for membership of a local authority;
 - may not be a candidate for membership of the National Assembly for Wales, the UK Parliament or the European Parliament.
- 41 Other political activities that may be prohibited by this Code include:
 - (a) holding office in party political organisations involved in party politics in local government, the National Assembly for Wales, the UK Parliament or the European Parliament;
 - (b) speaking in public on matters of local or national political controversy;
 - (c) expressing views on such matters in letters to the press, or in books, articles or leaflets, or in any other media that is in the public domain;
 - (d) canvassing on behalf of candidates for local authorities, the National Assembly for Wales, Parliament or the European Parliament or on behalf of a political party.
- Members wishing to engage in political activities should first seek the advice of the Chair and the Auditor General who will consider each case on its merits¹. If any conflict of interest or reasonably foreseeable potential damage to the interest of the Auditor General or Wales Audit Office arises from a member's involvement in political activities, the Member must withdraw from that activity.

Lobbying and access to members of public bodies

- The public must be assured that no person or organisation will gain better access to, or treatment by, members as a result of employing a company or individual to lobby on a fee basis on their behalf. Members must not, therefore, offer or accord any preferential access or treatment to those lobbying on a fee basis on behalf of clients compared with that which members accord any other person or organisation who lobbies or approaches them. Nor should those lobbying on a fee basis on behalf of clients be given to understand that preferential treatment or access might be forthcoming from another member of the Wales Audit Office.
- Before taking any action as a result of being lobbied, members should seek to satisfy themselves about the identity of the person or organisation who is lobbying and the motive for lobbying. Members may choose to act but it is important to ensure that any action taken complies with the standards set out in this Code.
- 45 Members should not accept any paid work:
 - (a) that would involve lobbying the Auditor General, the Wales Audit Office, the National Assembly or a body that the Auditor General audits;
 - (b) to provide services, for example, as a strategist, adviser or consultant, advising on how to influence the Wales Audit Office and its members. This does not prohibit remuneration for activity that may arise because of, or in relation to, membership of the Wales Audit Office, such as journalism or broadcasting or involvement in

¹ The Chair and the Auditor General will have regard to human rights when considering a request from a Board member and will seek advice where necessary

- representative or presentational work such as participation in delegations, conferences or other events.
- If a member is concerned about an approach or the methods used by any person or organisation they must seek guidance from the Chair.

Registration of interests

This section sets out the kinds of interests that members must register when they are appointed and which they must update at least annually or when their circumstances change. It is a breach of this Code to fail to comply with these requirements.

Remuneration

- There are no restrictions on paid employment or other economic activities beyond those provided in the Public Audit (Wales) Act 2013 and members' terms of appointment, provided that such activities do not compete with the work of the Auditor General or the Wales Audit Office and there is no risk of it bringing discredit upon the organisation. However, members proposing to undertake outside employment or other economic activity must obtain the consent of both the Auditor General and the Chair if it:
 - (a) is employment or activity as an auditor, accountant or book-keeper;
 - (b) involves the use of official information acquired in the course of official duties;
 - (c) is employment, or activity, for any body to which the WAO may award business or contracts;
 - (d) involves working for or advising a body audited by the Auditor General.
- In the case of employee members, any fee or payment for private work must be surrendered to the Wales Audit Office if the preparation or execution of the work is undertaken in official time, as should any fees for speeches or lectures given in an official capacity. Any travel, accommodation or meals provided in connection with such events must be reasonable in the circumstances.
- 50 Members have a registrable interest if they receive remuneration by virtue of being:
 - a) employed;
 - b) self-employed;
 - c) the holder of an office;
 - d) a director of an undertaking;
 - e) a partner in a firm; or
 - f) undertaking a trade, profession or vocation or any other work.
- 51 Members do not need to register the amounts of remuneration.
- 52 Members must register membership of any organisation from which they received an allowance.
- When registering their interests, members must give the following information:
 - (a) for employment the name of the employer, the nature of the business and the position held in the organisation or the services for which the remuneration is given
 - (b) for self-employment or other economic activity the name and details of the nature of the business, and the names of all Welsh public sector and UK accountancy industry clients;
 - (c) for a partnership the name and the nature of the business;

- (d) for a directorship the registered name of the undertaking in which the directorship is held and a broad indication of the nature of the business.
- Where members undertake a trade, profession, vocation or any other work they will register the nature of the work.
- If a position is not remunerated, it does not need to be registered under this category. However, unremunerated directorships may need to be registered under the category of "related undertakings".
- 56 Registration of a pension is not required as it falls outside the scope of this category.

Related undertakings

- Members must register any directorships which themselves are not remunerated but where the company or undertaking in question is a subsidiary or parent of a company or undertaking in which the member holds a remunerated directorship.
- Members must register the name of the subsidiary or parent company or undertaking, the nature of its business and its relationship to the company or undertaking of which they are a director.

Contracts

- Contracts must be awarded on merit in fair competition against other potential suppliers. Members who have any personal, domestic or business relationship with potential suppliers must register it and must not have any involvement in the letting of contracts for which such suppliers might bid.
- Members must register an interest where they, a firm in which they are a partner, an undertaking of which they are a director, or an undertaking in which they have shares or other securities, have a contract with the Wales Audit Office under which goods or services are to be provided or works are to be executed. Members must register a description of the contract, including its duration but excluding the consideration.
- Members must declare any investment interests they hold with suppliers or consultants.

 Where conflict might arise, the member should dispose of their investment or ensure that they play no part in awarding the contract or selecting consultants.

Shares and other securities

- Members may hold private investments. They should not, however, hold or deal in shares or other securities when they are in a position to gain information through their position with the Wales Audit Office which might affect the value of such securities.
- If members hold shares or securities that might raise a question of possible conflict with the interest or independence of the Auditor General or Wales Audit Office, they should register the interest. Examples of where conflicts exist are when an individual:
 - (a) knows of a public sector contract to be placed with a public company;
 - (b) knows of planned actions that might affect a company's prospects.
- Members must register an interest in shares or securities that constitute a holding in a company or organisation that may be significant to, of relevance to or bear upon the work and operation of the Auditor General and WAO. Members are not required to register the value of such interests.

When considering the appropriateness of registration, the test is whether a member of the public acting reasonably might consider that any interests in shares and securities could potentially affect a member's responsibilities to the Wales Audit Office and to the public or could influence the member's actions, speeches or decision-making.

Non-financial interests

66 It is equally important that members register and describe any relevant non-financial interests, such as membership or holding office in clubs, voluntary organisations and societies. Such interests are those that members of the public might reasonably think could influence a member's actions, speeches or votes in conduct of Wales Audit Office business.

Related party disclosures

- 67 Related party disclosure is a requirement of International Accounting Standard (IAS) 24. A related party transaction is a transfer of resources, services or obligations between related parties, regardless of whether a price is charged. It is a requirement of this Code that Board members sign an annual declaration at the financial year end disclosing any related party transactions or stating that they were not aware of any related party transactions in the year.
- Board members and their close family members fall within the definition of related parties in respect of the Wales Audit Office's financial statements.
- Related party transactions arise from receiving remuneration from, having a controlling interest in or having influence over:
 - (a) any organisation with a contract with the Wales Audit Office, or with which the Wales Audit Office is proposing to contract;
 - (b) any organisation audited by the Auditor General (or an auditor appointed by him);
 - (c) any organisation with which the Auditor General is under a statutory duty to cooperate, such as the Welsh Ministers in their guise of Health Inspectorate Wales or Care and Social Services Inspectorate Wales.
- Related party transactions also arise from owning or having an interest in land or property that is owned, leased or rented by the Wales Audit Office.
- Where Board members, their immediate or close family members, or others with whom they have a close personal relationship have business relations with the Wales Audit Office or an audited body these must be declared, except where they:
 - (a) involve the purchase of goods and services from the audited body in the ordinary course of business and on an arm's length basis and which are not material to either party; or
 - (b) are clearly inconsequential to either party.

Declarations of interest

The Board's terms of reference require members to declare their interests as appropriate in any proceedings of the Wales Audit Office regardless of whether those interests have also been recorded on the Register of Interests. Such declarations are made at the start of any meeting, or as soon as the necessity is apparent. If a member is unsure as to

- whether a conflict of interest exists, they should seek advice before or during the meeting from the Chair.
- In considering whether to make a declaration, members must consider whether they might be influenced by the interest. Members must also apply the objective test i.e. whether a member of the public, with knowledge of the relevant facts, would reasonably regard the interest as so significant that it is likely to prejudice a member's discussion or decision-making.
- If a member feels that, in the context of the matter being considered, their involvement is neither capable of being viewed as more significant than that of an ordinary member of the public, nor likely to be perceived by the public as wrong, they may continue to participate in the meeting and voting. However, the relevant interest must be declared. Members are responsible for judging whether an interest is sufficiently relevant to require a declaration but should err on the side of declaration.
- If an interest is prejudicial, the member must withdraw from the meeting from the commencement of the agenda item giving rise to the conflict or potential conflict until the item has been concluded.
- 76 Examples of where prejudicial interests may arise are:
 - (a) any organisation of which a member or their close family or associate is a member, office-holder or employee, or in a position of control or management;
 - (b) any employment or business carried out by a member or their associate;
 - (c) any person or organisation who employs the member or their associate;
 - (d) any contract between the Auditor General or the Wales Audit Office and any entity that the member or his or her associate is a partner in or director of, or in which the member or his or her associate has an investment exceeding £5,000;
 - (e) the interests of any person from whom the member or his or her associate has received a gift or hospitality with an estimated value of at least £25.
- A prejudicial interest is an interest in any business of the Auditor General or Wales Audit Office which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice the member's judgement of the public interests.
- Participate members may not participate in Board proceedings where they have a personal interest, except where such an interest is remote. Employee members may not participate in specific discussions concerning staff restructuring, appointments, redundancies, pay and conditions, and disciplinary matters concerning particular individuals, should the Chair determine that they have a conflict of interest. In such cases, the employee members may not see papers relating to such matters and must leave the meeting if and when so determined by the Chair.
- 79 When a Board member makes a declaration of interest, the Board Secretary must record it in the minutes. The Board Secretary must also assist the member to check whether the matter should be registered in the Register of Interests in accordance with paragraphs 46 to 69 of this Code.
- If members are frequently declaring interests at meetings they should consider whether they can carry out their role effectively and discuss it with the Chair. Similarly, if any appointment or nomination to another body would give rise to objective concern about membership of the Wales Audit Office, members should discuss the position with the Chair.

Appendix 1

Definitions

- 1 Remuneration includes any salary, wage, share of profits, fee, expenses, other monetary benefit or benefit in kind. This would include, for example, the provision of a company car by an employer.
- 2 Undertaking means:
 - (a) a body corporate or partnership; or
 - (b) an unincorporated association carrying on a trade or business, with or without a view to profit.
- Related undertaking is a parent or subsidiary company of a principal undertaking of which a member is also a director.
- 4 **Parent company or undertaking** is a company or undertaking in relation to another (subsidiary) undertaking if:
 - (a) it holds a majority of voting rights in the undertaking; or
 - (b) it is a member of the undertaking and has the right to appoint or remove a majority of its board of directors; or
 - (c) it has the right to exercise a dominant influence over the undertaking -
 - by virtue of provisions contained in the undertaking's memorandum or articles or
 - by virtue of a control contract; or
 - (d) it is a councillor of the undertaking and controls alone, pursuant to an agreement with other shareholders or councillors, a majority of voting rights in the undertaking.
- An **associate** is a person with whom an individual consorts. Associates include persons in the same organisation who meet for discussion or other personal interaction (e.g. members of a sports club who meet socially).
- **Family** includes spouse, civil partner, cohabitee, personal relationship partner, parents, grandparents, step-parents, siblings, step-siblings, children, grandchildren, step-children, uncles, aunts, nieces and nephews.
- 7 **Immediate family** means an individual's spouse (or equivalent) and dependents.
- 8 **Close family** means "immediate family" plus parents, non-dependent children and siblings.

Appendix 2

Notice of registration of interests: [name]

Registrable interest	Description of interest	Entry (please state NONE where applicable)
Remuneration	A description of: (a) remuneration received by virtue of being — (i) employed or self-employed; (ii) the holder of an office; (iii) a director of an undertaking; (iv) a partner in a firm; (v) a member of any organisation; (vi) a participant in a trade, profession, vocation or any other work; (b) any allowance received in relation to membership of any organisation; (c) the name (and registered name if different) and nature of any applicable employer, self-employment, partnership, business, undertaking or organisation; (d) the nature and regularity of the remunerated work; and (e) the name of the directorship and the nature of the applicable business.	
Related undertakings	The name and a description of any directorship that is not itself remunerated but is of a company or undertaking which is a parent or subsidiary of a company or undertaking which pays remuneration.	
Contracts	 A description of the nature and duration (but not the value) of a contract which is not fully implemented where: (a) goods and services are to be provided to, or works are to be executed for, the Wales Audit Office or a body audited by the Auditor General; and (b) you have a direct interest, or an indirect interest as a partner, owner or shareholder, director or officer of a business or undertaking, in such a contract. 	
Shares and securities	A description (but not the value) of shares or securities in a company, undertaking or organisation that may be significant to, or bear upon the work of the Auditor General, the Wales Audit Office or a body audited by the Auditor General.	
Non-financial interests	A description of interests that may be significant or of relevance to the work of the Auditor General, the Wales Audit Office or a body audited by the Auditor General, including (without prejudice to that generality) membership of or office in:	

Registrable interest	Description of interest	Entry (please state NONE where applicable)
	(a) other public bodies;	
	(b) clubs, societies and organisations;	
	(c) trade unions; and	
	(d) voluntary organisations.	
Related party disclosures	A description of any related party transactions that you were aware of in	
	the past year.	

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Signature:

Date:

Appendix 3

Code of Conduct Return

I have read and understood:

- the Board's Code of Conduct;
- the information security policy;
- the information governance policy;
- the social media policy;
- the gifts and hospitality policy;
- the health & safety policy;
- the Board's travel and subsistence policy.

I have complied fully with the provisions of the abovementioned Code and policies.

I understand that breach of the abovementioned Code and policies may be reported to the National Assembly's Finance Committee (where appropriate) and / or may lead to the termination of my appointment.

Name:		
Signature:		
Date:		

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