

# Our ethics policy

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# Introduction

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Our purpose is to protect the public, both as consumers of aviation services and as citizens affected by aviation activity. We are most effective when we are impartial, exercising our regulatory functions independently, and when we act with integrity, meeting the highest professional standards. In short, if we behave ethically the public whose interests we serve can be confident that we have acted in their interest and not our own. If we do not act ethically, not only might we break the law but, more importantly, we might also breach the trust that has been placed in us by the public, by industry and by each other.

This Ethics Policy is designed to explain the standards we strive to meet and the principles that underpin those standards. It covers conflicts of interest, gifts and hospitality, and bribery and corruption. It sets out restrictions on members' and employees' financial and non-financial activities and interests, guidance on how to identify and deal with any conflicts of interest, how to respond to offers of gifts and hospitality, and how to ensure that we prevent bribery and corruption.

Each of us must behave professionally and ethically at all times and use this policy to guide the decisions we take.

## Application of this policy

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**This policy applies to:**

- **all members of the CAA and**
- **all employees of the CAA, whether permanent, casual, fixed, agency employees or contractors and whether they work for the CAA, Ci or ASSI or UKAB.**

It also applies in respect of spouses, partners and dependants where their activities and interests could cast doubt on an individual's ability to comply with this policy.

Where you also work for another organisation, for example as a non-executive director, trustee or contractor, this policy applies only in respect of the role you have at the CAA. Please be aware, though, that adverse inferences may be drawn because of your role at other organisations and any gifts or hospitality that you accept while working for them.

You should strive to act ethically at all times and be aware of and alert to possible ethical challenges and conflicts of interest. Where ethical challenges or conflicts of interest arise your first step is to consider the right course of action in the circumstances and, if you need help or assistance, discuss the situation with your line manager or director.

All identified conflicts of interest *must* be resolved. It is your responsibility to consider the situation carefully and seek advice from your manager if you are unsure whether to declare an interest. Failure to resolve conflicts may result in disciplinary action being taken, including dismissal in the most serious cases.

Although this policy applies to all members and employees and their spouses, partners and dependants, please be aware that potential conflicts might arise that involve non-dependant family, friends and wider acquaintances.

## Chapter 1

# Our ethical standards

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1.1 Our ethical standards are the principles that govern our behaviour and actions; they identify conduct that is acceptable and conduct that is unacceptable. These are our standards:

We:

- put the interests of the public above our own interests;
- are open and truthful;
- take decisions based on analysis of all of the evidence and the application of our expert judgement to all relevant factors;
- act only in accordance with the merits of the case;
- act in a way that is professional and deserves and retains the confidence of all those with whom we have dealings;
- treat all information we give or receive with care, making sure that we understand and respect its confidentiality, use it only for lawful purposes and manage it properly and securely;
- do not misuse our official position;
- do not allow our past experience, personal interests, or specialist knowledge to pre-determine the outcome of any matter;
- are not influenced by improper pressures or the prospect of personal gain;
- do not ignore inconvenient facts or relevant matters;
- do not unjustifiably favour or discriminate against any individual, organisation or interest.

1.2 As a professional you are responsible for behaving ethically and in accordance with this Ethics Policy. It is your responsibility to decide what is acceptable in any given situation. If you need assistance in considering what is acceptable, please speak with your line manager or your group director.

1.3 If you believe that you are being required to act in a way which conflicts with this Ethics Policy, you should start by talking to your line manager or someone else in your line management chain. If for any reason you would find this difficult, you should raise the matter with your group director or the [ethicsguide@caa.co.uk](mailto:ethicsguide@caa.co.uk).

- 1.4 If you become aware of actions by others which you believe conflict with this Ethics Policy you should report this to your line manager, someone else in your line management chain or the [ethicsguide@caa.co.uk](mailto:ethicsguide@caa.co.uk). Alternatively, you may wish to seek advice from the CAA Whistleblowing Focal Point.
- 1.5 You should report evidence of criminal or unlawful activity to the police or other appropriate regulatory authorities and to the General Counsel.

## Chapter 2

## Board Members' conduct

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- 2.1 A member of the CAA must disclose and record any interests that are or may potentially be relevant to the performance of their functions. Further, a member of the CAA may not take part in any deliberation or decision of the CAA where the CAA decides that the member's interests might prejudicially affect their consideration of the matter at hand. For these reasons, the CAA has long maintained a register of members' interests, which is published on the CAA website, and keeps this ethics policy under review.
- 2.2 Members of the CAA will be expected to show complete confidentiality in respect of information or materials supplied to them for the purposes of and in connection with their CAA duties. Members must protect such information and must not disclose it without first having received confirmation from the General Counsel that disclosure would be lawful and from the Chair, Senior Independent Director or Chief Executive that disclosure would be appropriate.
- 2.3 Members must not disclose, publicly discuss or comment on any CAA Board discussions or any other CAA matters with which they are involved.
- 2.4 Members must not make public comments which might damage the CAA's authority or standing.
- 2.5 Members must not misuse information gained in the course of their CAA role for personal gain or for political purposes.
- 2.6 Where a member has any concerns about issues of conduct they should raise them with the Chair, the Senior Independent Director or the General Counsel.
- 2.7 Paragraphs 2 and 3 of this section apply to any CAA employee who attends a CAA Board meeting, or a meeting attended by a member of the CAA.