

## **Luther Pendragon Ltd: Code of Professional Practice**

### ***Part 1: Introduction, principles, review and training***

#### **Introduction**

1. Luther Pendragon is proud of its reputation and of the reputation of its individual members of staff. Our Code of Professional Practice states openly and clearly the professional standards which we as a company and as individuals apply to our work. By making ourselves accountable, we seek to reinforce and sustain the confidence that our clients and contacts should expect to have in our service.
2. Our standards for company practice and public affairs work can be found in section 2 below. Together with this section and the Code of Professional Conduct of the Chartered Institute of Public Relations at section 3, they form the Luther Pendragon Code of Professional Practice (the Luther Code).
3. An omission from the Luther Code is not licence to suspend commonsense or good judgement. In any case of doubt, staff must consult the sponsoring Partner for the account in question, or their mentor, or another Partner.
4. In interpreting the Luther Code, the laws of the land shall apply.

#### **The principles**

5. The overarching principles of the Luther Code are integrity and professional standards. As a company and as individuals, we will apply the highest professional standards in the service of all our clients. Our sole instruments of persuasion are truthful information and arguments. We will do nothing that damages or could be considered to damage the integrity of clients, ourselves, or those whom we seek to inform and persuade. We will take particular care in the case of democratic institutions and elected representatives.
6. The foundation of the Luther Code is the Code of Professional Conduct of the Chartered Institute of Public Relations (CIPR). CIPR is the professional body for public relations practitioners in the United Kingdom. The award of the Royal Charter reflects the fact that the Institute has been through the most rigorous investigation of the influence for good it has on the professional practice of public relations.
7. As a leading communications agency, Luther Pendragon supports CIPR membership for its consultants at every level. They are required to abide by the principles of the CIPR Code, whether they are members or not.
8. The CIPR Code emphasises that these are the vital components of robust professional practice: honest and proper regard for the public interest; reliable and accurate information; and never misleading clients, employers and other professionals about the nature of representation or what can be competently delivered or achieved. Every member of CIPR is accountable for their conduct under the CIPR Code and can be called to account by the Chartered Institute's professional practices committee.

#### **Independent review**

9. The Luther Code deals with issues arising in an ever-changing world. Regular review is essential to assure its continuing relevance, effectiveness and credibility.
10. An annual review of the operation of the code will be conducted by an Independent Adviser who will report his/her findings to the Board. The Independent Adviser will be appointed by the Board, who will seek the advice of the CIPR on the appointment. To perform his/her task, the Independent Adviser will have access to all records, and be free to interview any member of staff or other person in complete confidence.

#### **Staff training and advice**

11. It is essential that all staff understand the Luther Code and its implications. It is also important that they have ready access to advice and feel free to raise concerns.
12. All staff will be provided with a copy of the Luther Code on joining Luther Pendragon. It will be drawn to their attention and they will be expected to read it during their induction period. Regular training sessions will be provided, and a new member of staff will attend the first available session.
13. For immediate advice on the Luther Code, staff should approach the sponsoring Partner for the account concerned or their mentor. If they feel unable to do this, they may approach the Independent Adviser in complete confidence.

### ***Part 2: Company practice and public affairs***

#### **Purpose of this section**

14. This section deals with the company's general practice and its relationship with clients and those we seek to influence. It covers the key issues affecting integrity, confidentiality, truth, and conflicts of interest. It complements the standards for professional behaviour of individuals set out by the CIPR Code in Section 3.

#### **Democratic institutions and elected representatives**

15. Where democratic institutions govern the activities of members and staff in relation to external influence, or the activities of public affairs practitioners, we must follow their rules and the spirit of their rules at all times.
16. For clarity "democratic institutions" and "elected representatives" in the Luther Code refers to:
  - the UK Parliament, MPs, departments of state, statutory bodies and their respective staff
  - the Scottish, Welsh and Northern Irish parliaments/assemblies; MPs/assembly members; administrative bodies; and their respective staff
  - regional and local councillors and authorities throughout the UK and their respective staff;
  - and the European Commission, Council, Parliament, MEPs, and their respective staff.

#### **Hospitality and gifts**

17. It is acceptable to facilitate meetings and networking with reasonable hospitality, or to offer minor seasonal gifts. However, even these could be seen as inappropriate in certain circumstances. We must offer nothing that could be seen reasonably as an inducement or in other ways inappropriate, particularly in the case of democratic institutions

and elected members. In all cases of doubt, the relevant Partner must be consulted. He or she may also choose to consult the Independent Adviser.

#### **Client confidentiality**

18. Many clients are concerned about the confidentiality of their business. They wish to be assured that knowledge of their business gained by Luther Pendragon will remain confidential and under the client's control. Luther Pendragon will not reveal such knowledge to any third party, except as may be required by law, or exploit it without the client's permission.

#### **Telling the truth**

19. For decision-makers to form valid judgements on the merits of an argument, they must be aware of its full context. Where decisions concern public policy, and the decision-makers are democratic institutions and elected representatives, it is essential to the democratic process that they are accurately informed.

20. Therefore, where Luther Pendragon is directly involved in representing a client's case to democratic institutions and elected representatives, we will always state

clearly for whom we are acting, and the purpose of our work.

21. We will take all reasonable care to ensure that the information, arguments and propositions that we provide are factual and accurate. We will not lie or knowingly misrepresent the facts. Our standard contract terms state clearly that there is an obligation on clients to tell us the truth.

#### **Client disclosure**

22. In making representations to the institutions of government, Luther Pendragon will be open in disclosing the identity of our clients, in accordance with the APPC code.

#### **Secret clients**

23. Some clients require Luther Pendragon to keep our relationship secret. There are many good reasons for this, such as the protection of commercially sensitive information or the ability to gain a legitimate competitive advantage.

24. There are no general ethical or legal objections to secret clients, who can be found in many professional spheres. However, ethical questions do arise if the secrecy could or does lead to a breach of the standards expressed elsewhere in the Luther Code. This is a particularly sensitive issue where democratic institutions or elected representatives could be misled.

25. The motives behind a campaign and the source of its arguments are plainly relevant to public policy decisions. Therefore it is unacceptable to allow the absence of client information to manifestly mislead the people whom we are seeking to influence; or to allow a conflict of interest to remain hidden and unresolved.

#### **Conflicts of interest**

26. Conflicts of interests between clients, or between clients and potential clients must be avoided.

27. It is the responsibility of a team seeking new business to ensure that it will not conflict with existing business. If there appears to be a potential conflict, the existing client's prior agreement must be sought.

28. Where the existence of a client is known only to certain staff, there is a duty on the sponsoring Partner to prevent a conflict arising by continually reviewing new business activity.

### ***Part 3: Personal practice – the CIPR Code of Conduct***

**NB: This is the CIPR Code of Conduct current on 20 September 2007. If and when it is modified by the Chartered Institute, then that version shall become Section 3 of the Luther Code.**

#### **CIPR Principles**

1. Members of the Chartered Institute of Public Relations agree to:

- Maintain the highest standards of professional endeavour, integrity, confidentiality, financial propriety and personal conduct;
- Deal honestly and fairly in business with employers, employees, clients, fellow professionals, other professions and the public;
- Respect the customs, practices and codes of clients, employers, colleagues, fellow professionals and other professions in all countries where they practise;
- Take all reasonable care to ensure employment best practice including giving no cause for complaint of unfair discrimination on any grounds;
- Work within the legal and regulatory frameworks affecting the practice of public relations in all countries where they practise;
- Encourage professional training and development among members of the profession;
- Respect and abide by this Code and related Notes of Guidance issued by the Institute of Public Relations and encourage others to do the same.

#### **Principles of Good Practice**

2. Fundamental to good public relations practice are:

##### ***Integrity***

- Honest and responsible regard for the public interest;
- Checking the reliability and accuracy of information before dissemination;
- Never knowingly misleading clients, employers, employees, colleagues and fellow professionals about the nature of representation or what can be competently delivered and achieved;

- Supporting the CIPR Principles by bringing to the attention of the CIPR examples of malpractice and unprofessional conduct.

**Competence**

- Being aware of the limitations of professional competence: without limiting realistic scope for development, being willing to accept or delegate only that work for which practitioners are suitably skilled and experienced;
- Where appropriate, collaborating on projects to ensure the necessary skill base.
- Transparency and conflicts of interest
- Disclosing to employers, clients or potential clients any financial interest in a supplier being recommended or engaged;
- Declaring conflicts of interest (or circumstances which may give rise to them) in writing to clients, potential clients and employers as soon as they arise;
- Ensuring that services provided are costed and accounted for in a manner that conforms to accepted business practice and ethics.

**Confidentiality**

- Safeguarding the confidences of present and former clients and employers;
- Being careful to avoid using confidential and 'insider' information to the disadvantage or prejudice of clients and employers, or to self-advantage of any kind;
- Not disclosing confidential information unless specific permission has been granted or the public interest is at stake or if required by law.

**Maintaining professional standards**

3. CIPR members are encouraged to spread awareness and pride in the public relations profession where practicable by, for example:

- Identifying and closing professional skills gaps through the Institute's Continuous Professional Development programme;
- Offering work experience to students interested in pursuing a career in public relations;
- Participating in the work of the Institute through the committee structure, special interest and vocational groups, training and networking events;
- Encouraging employees and colleagues to join and support the CIPR;
- Displaying the CIPR designatory letters on business stationery;
- Specifying a preference for CIPR applicants for staff positions advertised;
- Evaluating the practice of public relations through use of the CIPR Research & Evaluation Toolkit and other quality management and quality assurance systems (e.g. ISO standards); and constantly striving to improve the quality of business performance;
- Sharing information on good practice with members and, equally, referring perceived examples of poor practice to the Institute.

**Interpreting the Code**

4. In the interpretation of this code, the Laws of the Land shall apply.

**Luther Pendragon July 2010**