

## APPENDIX Register of Interests - Staff

### Final Action Plan

| Finding   | Recommendation   | Priority Rating | Management Response  | Responsible Officer                             | Implementation Date            |
|---|--|-----------------|--|---|--------------------------------|
| <b>Objective: There are robust and up to date policies and procedures to guide Staff on the need to register and have approval for any interests they have that may impact on their duties as an employee</b> |  |                 |  |   |                                |
| <b>Risk: The reputation of the Council is damaged as a result of accusations being made against staff that they were unfairly influenced in their decisions</b>   |  |                 |  |   |                                |
| 1.1a Staff are not reminded of their requirements to record all Interests   | I recommend that the Assistant Director (Legal & Corporate Services) ensures that the Policy for staff to record personal interests is enforced through a robust procedure; Every Service should maintain a record and have at least annual reminders issued to all staff. | 3 - Medium      | Agreed. It is proposed that there be twice yearly reminders to staff. A record template will be produced to be used by all services. A clear audit trail will be established between actions of staff in notifying management and action of management in recording notifications. | Assistant Director (Legal & Corporate Services) | 31 <sup>st</sup> December 2011 |

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|---|---|-----------------|---|---|--------------------------------|
| 1.1b  | I recommend that the HR Manager consider adding the Staff Code of Conduct to the Induction process and briefly highlighting the need to declare other interests. It would be good practice to introduce a declaration process at induction where staff sign to state that they do not have other interests. | 3 - Medium      | The Code of Conduct is included in the New Starter Induction Pack, which is sent out to new starters and the manager signs to confirm they have been through the induction pack with the member of staff within one month of the employee starting. | HR Manager                                      | Completed                      |
| 1.2a There are no records of staff declared interests | I recommend that the Monitoring Officer considers an improvement to the system of recording staff interests. It is recognised that a corporate record may be difficult to maintain and it may be more practical for records to be held at service level.  | 3 - Medium      | At this stage due to resource implications it is proposed that a service based system model be established with annual oversight of the records to ensure consistency and accuracy of data capture.   | Assistant Director (Legal & Corporate Services) | 31 <sup>st</sup> December 2011 |