

## APPENDIX Register of Interests - Staff

### Progress against Action Plan

Finding	Recommendation	Priority Rating	Progress	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	The Form to capture the information has been prepared together with the initial letter to staff and the reminder that will be sent at six monthly intervals. All staff will be required to complete the declaration irrespective of whether they have any interests. The relevant service manager will keep the completed forms.	Assistant Director (Legal & Corporate Services)	31 <sup>st</sup> December 2011 – On target

Finding	Recommendation	Priority Rating	Progress	Responsible Officer	Implementation Date
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 has now been included in the New Starter Induction Pack, which is sent out to new starters. In addition the manager signs to confirm they have been through the induction pack with the member of staff within one month of the employee starting their employment with SSDC. The manager will also go through the new forms as part of the induction process.	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	The approach to be adopted is service based. This means that individual services will deal with their own staff and input the data onto a set spreadsheet. There will be an annual oversight of the records by the Monitoring Officer to ensure compliance, consistency and accuracy of data capture.	Assistant Director (Legal & Corporate Services)	31 <sup>st</sup> December 2011 – On target

## Declarations of interest by staff – New “Rules”

The employee Code of Conduct contains a lot of guidance about interests staff may have outside of work that could impact upon it or be perceived by the public to potentially impact upon it. A recent audit inspection has revealed some shortcomings in our processes in this area and this new requirement is part of addressing their concerns. It is important that all staff make a formal and recorded declaration of any personal interest that they consider may be relevant to their role as an officer of this council. This also includes declaring any other employment.

When considering whether or not to declare an interest, ask yourself whether the average person, knowing that you work for the council, might think that you could influence a council decision on a matter or the way in which it may be dealt with. The form provided for this purpose, Form CC1, sets out what information should be provided and should **only** be completed if you have relevant information to disclose. **All** staff must complete Form CC2 even if they have no entries to make on Form CC1.

It is also important that all staff are aware of the requirements set out in the code in relation to conflicts of interest and how they should be handled. In relation to any set of circumstances when they think they may have a conflict of interest and staff are not sure what to do, then they should speak to their service manager as soon as possible or seek guidance from me.

All completed Forms CC1 and CC2 (as appropriate) should be returned to your service manager as soon as possible. They will be kept securely and a summary provided to me to enable me to check for consistency and compliance. I may also need to inspect the actual CC1 and CC2 form, as may our auditors. There will be reminders sent to staff every six months or so to ensure the information is kept up to date but unless there have been material changes, declarations made by staff in previous years need not be repeated unless they wish to do so. It would be a good idea for staff to keep a copy of any Form they return for their own records.

If you need any further information or advice or if you are unsure whether you have an interest which should be declared, please discuss this with your manager or raise the question directly with me.

Ian Clarke  
Monitoring Officer  
Assistant Director Legal & Corporate Services

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## Declarations of interest by staff – Reminder

A while ago all staff were contacted about making a formal and recorded declaration of any personal interest that they consider may be relevant to their role as an officer of this council. This also includes declaring any other employment. This note is simply to remind staff to consider whether the details they previously provided have materially changed. If they haven't, then nothing needs to be done; if they have, then you will need to complete a new Form CC1 and Form CC2.

You may recall that you were advised when considering whether or not to declare an interest, to ask yourself whether the average person, knowing that you work for the council, might think that you could influence a council decision on a matter or the way in which it may be dealt with.

It is also important that all staff are aware of the requirements set out in the Code in relation to conflicts of interest and how they should be handled. In relation to any set of circumstances when they think they may have a conflict of interest and staff are not sure what to do, then they should speak to their service manager as soon as possible or seek guidance from me.

All completed Forms CC1 and CC2 were returned to your service manager so if you didn't keep a copy and are not quite sure what you said previously then ask your service manager to give you access to the information so you can check.

If you need any further information or advice or if you are unsure whether you have an interest which should be or should have been declared, please discuss this with your manager or raise the question directly with me.

Ian Clarke  
Monitoring Officer  
Assistant Director Legal & Corporate Services



## FORM CC1

### Registration of Employee Interests under Code of Conduct

Name: (Please Print) \_\_\_\_\_

Service: (Please Print) \_\_\_\_\_

**Please note:** This form deals with the registration of interests only. You should follow the advice in the Code of Conduct, which sets out the rules about Employee conduct in terms of acting impartially and being seen to act impartially. It also deals with how any conflicts of interest should be dealt with.

The completed form and the signed declaration CC2 should be given to your Service Manager (who should also receive an updated copy if any information changes) who will record all entries onto a database, which will be provided to the Monitoring Officer. The Register of Employee Interests will be held securely by your Service Manager.

**If you don't have any entries to make to the Form CC1 (other than "None" or "N/A") then you need only complete and sign the declaration contained in Form CC2**

If you have any questions about this form, please speak to your Service Manager or the Assistant Director – Legal & Corporate Services.

The Employee Code of Conduct is on Insite.

**This form seeks to identify any business and personal interests which you or your family or friends have which could conflict with the interests of the Council. Each section tells you whether it applies to you and if it does exactly what you should declare.**

#### 1. Financial Interests

**Contracts with the Council (excluding your contract of employment with the Council)**

(Please provide full details here)

#### **Notes: This section applies to all council staff**

1. You must disclose contracts and proposed contracts with the Council where you, or your spouse or partner with whom you live, or another immediate family member stands to benefit, directly or indirectly. This disclosure must be made as

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soon as reasonably practicable. Some employees may need to update their declarations regularly.

2. You should describe all contracts which have yet to be completed, and which are for the supply of goods, services or works to the Council.
3. You need not say what the financial agreements are, but should say for how long the contract is and what it is in relation to.

## Tenancies/Licences with the Council

Do you or a member of your family have any tenancy or licence arrangements with the Council?

Yes		No	
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If 'yes' please provide full details here i.e. location of property and terms of the lease or licenses

## 2. Personal Interests

**Relationships with Contractors – NOTE: ONLY to be completed by Employees who engage or supervise the Council's contractors or potential contractors or who advise in any way on their selection**

Please provide full details here:

## Notes

- All relationships of a business or private nature with such contractors must be disclosed.
- Employees who have previously had or currently have a relationship in a business, private or domestic capacity with those contractors should declare that relationship.
- "Potential contractor" in this context means someone tendering or quoting for work with the Council or who has been requested to do so or has been in correspondence with the Council on the subject – in each of these cases where known to the employee. The intention is that the word "relationship" is used in its widest possible sense so that it would include, for example, connections of family and friends where known.

**Employment, Office, Trade, Profession or Vocation (excluding your employment with SSDC)**

**NOTE: this is only relevant if you have an additional non SSDC job and applies to all staff – those with an additional non SSDC job on SCP29 and above must complete paragraph 1 below and those with an additional non SSDC on SCP28 or below must complete paragraph 2.**

**1. Are you on SCP29 or higher?** [if no, please go to 2 below]

(If “YES” you need prior written permission from your Corporate Director or the Chief Executive to take up any additional paid appointment or engage in any other business. Staff at this level are expected to work only for the Council, unless an alternative arrangement had been agreed. If “NO” please go to 2 below.

YES		NO	
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**Are you working only for the Council?**

YES		NO	
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**Do you have the agreement of your Corporate Director or the Chief Executive to this work?**

YES		NO	
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**What is the additional work you are doing?**

Please provide full details here:

**Notes: SCP 29 or higher**

1. You should show every other employment, office, trade, profession or vocation that you have to declare for income tax purposes. **You do not need to disclose any salary or earnings.**
2. Give a short description of the other activity concerned: for example “Computer Operator” or “Accountant”.
3. You should give the name of the employer.
4. Where you hold any other office, give the name of the person or body which appointed you.

**2. Are you on SCP 28 or below?**

You should obtain your Corporate Director’s agreement to any secondary employment before taking it on; permission will not be refused unless the work would unreasonably conflict with the interests of the Council or weaken public confidence in the conduct of the authority’s business.

**Do you work only for the Council?**

YES		NO	
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If NO, has your Corporate Director agreed you can do this other work?

YES		NO	
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## What is the additional work you are doing?

Please provide full details here:

### Other Bodies to which you have been appointed or elected

Please provide full details here:

#### Notes:

This could be where you are a member of another Council a JP, a Governor etc. or where you are in a position of control or authority e.g. a trustee, shareholder in relation of another body. Please remind yourself of the obligations in relation to conflicts of interest set out in the Code of Conduct.

### Membership of Secret Societies

Please provide full details here:

#### Notes:

You should declare any membership of secret societies which are:

'Any lodge, chapter, society, trust or regular gathering or meeting, which:

- (a) is not open to members of the public who are not members of that lodge, chapter, society or trust;
- (b) includes in the grant of membership an obligation on the part of the member a requirement to make a commitment (whether by oath or otherwise) of allegiance to the lodge, chapter, society, trust, gathering or meeting; and
- (c) includes, whether initially or subsequently, a commitment (whether by oath or otherwise) of secrecy about the rules, membership or conduct of the lodge, chapter, society, trust, gathering or meeting.

A lodge, chapter, society, trust, gathering or meeting as defined above, should not be regarded as a secret society if it forms part of the activity of a generally recognised religion'.

Freemasonry falls within the definition of a secret society. Freemasons who are members of The Grand Charity must register their membership of The Grand Charity.



**FORM CC2**

Name: (Please Print) \_\_\_\_\_

Service Area: (Please Print) \_\_\_\_\_

**Declaration**

Please put a cross against whichever of these two statements (a or b) applies to you. You **must** put a cross in one box and only one box.

a) I have no financial or other interests as described in Form CC1 which I have to declare

**OR**

b) I have set out under the appropriate headings in this form, my interests. Where I do not have an interest under a particular heading, I have put "**NONE**"

I recognise that it can be a disciplinary matter if I have deliberately or recklessly:

1. Omitted information that ought to be given in this notice;
2. Provided information that is materially false or misleading;
3. Failed to give further notices in order to:
  - bring up to date information given in this notice
  - declare an interest that I acquire after the date of this notice and have to declare
4. I understand the obligations and requirements set out in the Code of Conduct relating to Employees.

**This form and the related completed Form CC1 (if applicable) should be sent to your Service Head when you have signed it.**

**Signed** ..... **Date** .....  
*Employee of South Somerset District Council*

**Checked and Received** ..... **Date** .....  
*Signed by Service Head of South Somerset District Council*

**Name** .....

Receipt of Form acknowledged			<b>Date</b> .....
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<b>Details entered onto database</b>	
<b>Date</b> .....	<b>By Whom</b> .....