

Conflicts of Interest Policy

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Scope

1. The Conflicts of Interest Policy applies to all employees and other workers i.e. casual workers, agency workers, consultants, prospective employees under conditional offer of employment, service providers and third-party advisors. For ease of reference the term “employees and / or other workers” will be used in the policy unless otherwise stated as applying only to employees or specified other workers.
2. Where there are additional requirements in the policy applicable to Chief Officers and senior managers at grades I and J (including any other employees and other workers with the same level of seniority); for ease of reference the term “Senior Management” will be used, unless it is stated as applying only to part of this group.
3. As far as possible, employees and other workers must also comply with the policy if they are appointed as a representative of the City of London Corporation on any organisation, trust or company in addition to the requirements of such bodies.
4. The principles detailed below set common standards for all employees and other workers, but individual Chief Officers may wish to issue further guidance specifically relating to their departmental service requirements, which will supplement but not contradict the principles contained in this policy.
5. This policy does not affect employees and other workers rights and responsibilities under the law. These principles should be taken in conjunction with requirements set down by any employee and other workers professional bodies obligations and the City Corporation’s Code of Conduct.
6. Whilst the policy tries to cover as many aspects of business conduct as possible, it is recognised that issues will arise which will not fit precisely into the categories described. Where this is the case employees should consult their line manager, who may seek advice as necessary from Corporate HR or their HR contact.

Standards

7. Employees and other workers are expected to give the highest possible standard of service to the public, service users, Members, management and colleagues; and where it is part of their duties to provide advice to Members and colleagues, to do so with impartiality and in good faith.
8. This will be achieved in part through the demonstration of effective and appropriate behaviours defined internally, and adherence to the Principles of Public Life i.e. selflessness, objectivity, accountability, openness, leadership, honesty and integrity in which the public, Members, or managers can trust. Employees and other workers are expected to conduct themselves with the reasonable held belief that the City Corporation is not likely to fundamentally undermine the required relationship of trust and confidence between themselves and the organisation.

9. There is an implied duty in employment and casual worker contracts to serve the employer with good faith and fidelity (i.e. the duty: not to disrupt the employer's business, not to compete, not to solicit customers, not to entice employees, not to misuse the employer's property; and the duty: of confidentiality and to account); the duty to: obey lawful and reasonable instructions, to be adaptable and to exercise reasonable care and skill. Equivalent provisions will be included in contracts with other workers.
10. Employees and other workers must immediately inform their line manager in writing if, during their City Corporation employment / engagement circumstances arise (during or outside of working hours) that could reasonably be expected to impact on their capability, capacity and / or suitability to carry out the duties and responsibilities of their role.
11. Employees and other workers must not conduct themselves in a way that brings or could bring the City Corporation, Members, service users, partners and colleagues into disrepute or cause reputational damage, so that it is likely to destroy or seriously damage the relationship of trust and confidence between them.
12. All employees and other workers should refer any enquiries from journalists directly to the Media Team, without engagement. Any article, publication or interview given on City Corporation policy or activity must be properly authorised by the Director of Communications or Head of Media.
13. In cases of doubt about what constitutes a conflict of interest, employees and other workers should always try to establish in advance the validity of a particular action by consulting their line manager. However, if an employee or other worker initially acted in good faith, then later considered the action to be contrary to the spirit of this policy, they should inform their line manager at the earliest opportunity who may seek advice as necessary from Corporate HR or their HR contact.
14. To ensure compliance with the Conflicts of Interest Policy, employees and other workers should periodically familiarise themselves with the latest version and any documents referred to therein. Any substantive contravention of this policy may result in disciplinary proceedings, and those disciplinary proceedings may result in dismissal. For other workers not falling within the scope of disciplinary procedures appropriate action will be taken. In addition, certain cases such as those involving bribery, corruption or fraud may also be referred to the police and subject to a criminal investigation. Where the offence involves financial irregularities then the City Corporation will aim to recover its assets.
15. Employees and other workers shall not during or at any time after their employment / engagement with the City Corporation ending (except in the proper course of their duties or unless required by law), disclose or otherwise make use of any confidential

information¹ relating to the City Corporation's business, strategy, policies or finances, including personal information relating to service users, Members or employees or other workers. (See Code of Conduct, Disclosure of Information).

16. Employees and other workers will be expected, through agreed procedures and without fear of recrimination, to bring to the attention of the appropriate level of management potential deficiencies in the provision of service. Employees and other workers must report impropriety or any material breaches of procedure to the appropriate manager. The Whistleblowing Policy is also available to employees who feel they need to raise an issue outside of the management chain. (See below, Raising Concerns and Whistleblowing).
17. The Director of Human Resources will be responsible for the interpretation, advice and management of this procedure on behalf of the City Corporation.

Conflicts of Interest

18. A 'conflict of interest' is a set of circumstances by which a reasonable person would consider that an individual's ability to apply judgement or act could be impaired or influenced by another interest they hold. Conflicts can be financial or non-financial and may be:
 - **Insignificant:** trivial and does not create a real risk of conflict of interest;
 - **Perceived or potential:** reasonably perceived or where there is the real possibility of a future material conflict, between one or more interests; or
 - **Actual:** if there is a material conflict between one or more interests.
19. For details of the circumstances to make a disclosure, when and who should make a disclosure; see below at: Circumstances to complete a Declaration of Interest Form; and in addition, for Chief Officers: Circumstances to complete a Register of Interest Form.
20. Detailed below are the most typical areas in which conflicts of interest arise but these are not exhaustive. An employee or other worker should self-declare any other actual or potential conflict, as where there is a risk of improper conduct caution is always advisable.

Relationships

21. Candidates when making an employment application must disclose on the application form whether they are related to a Member and detail any other connection to the City Corporation. Deliberate omission to make such a disclosure will disqualify the

¹ Information obtained in the course of employment / engagement should not be used for personal gain or benefit, nor should it be passed on to others who might use it in such a way.

candidate and if the omission is discovered after appointment, they may be liable to dismissal.

22. Employees and other workers involved in making appointments must ensure that these are made on the basis of merit and must declare to their line manager or senior manager any relationship between the candidate and themselves to avoid any possible accusation of bias. It is unlawful for an employee or other worker to make an appointment based on anything other than the ability of the candidate to undertake the duties of the post. These principles and the City Corporation's procedures are detailed in the Recruitment and Selection Policy.
23. The City Corporation reserves the right, where such a relationship exists between employees or other workers, to ensure that the persons concerned are not employed in a situation where one would be responsible for managing the other. Alternative mitigating measures may be introduced to ensure that appropriate reporting lines are in place.
24. Any close personal relationships employees and other workers have with a Member, a contractor / potential contractor; a worker in a City Corporation partner organisation, a service user, or as a manager / supervisor with an employee and other worker or vice versa should be declared to ensure that potential problems including any perceptions of unfairness are avoided. Any such disclosures will be dealt with sensitively.
25. Employees and other workers should not be involved in decisions relating to employment matters such as discipline, promotion or pay adjustments for any other employee or other worker who is a relative, partner or someone they have a close personal relationship with. Nor, any situation which could potentially involve a conflict of interest in work roles, for example the countersigning of invoices against purchase orders raised by someone with whom they have a close personal relationship.
26. On no account must employees and other workers be directly involved in the administration or decision-making on a matter or application on behalf of the City Corporation involving their close relative (including a child), or any other person with whom they have a close personal relationship. Should such a situation arise, employees and other workers must inform their line manager or senior manager to determine appropriate action.
27. Neither must employees and other workers abuse their position of trust to access records relating to themselves, their close relatives or those with whom they have a close personal relationship (refer to the Code of Conduct section: Data Protection, Information Technology and Security).

Personal Interests

28. Employees and other workers must declare to their Chief Officer, any financial or non-financial interests that could bring about conflict with the City Corporation's interests

using the Declaration of Interest Form (Officers) and submit it to the appropriate Chief Officer. Employees and other workers should be mindful not to place themselves in a situation which could compromise their continuing professional duty to the interests of the City Corporation.

29. Employees and other workers are required to serve the City Corporation and must not allow their personal political opinions to interfere with their work. (Refer to the Code of Conduct section: Political Neutrality and the Politically Restricted Posts Policy).
30. Employees and other workers should self-declare any relationship they have with a Member in the interest of transparency and must not lobby Members inappropriately in relation to personal issues affecting either their employment or other matters personal to them. (Refer to, Protocol on Member/Officer Relations). This does not preclude employees who are also residents of the City Corporation, from raising matters in relation to local matters, appropriately in their own time.
31. Employees and other workers must declare membership of any organisation not open to the public (with formal membership and commitment of allegiance); which has secrecy about rules and / or membership, and / or conduct. For example, the Freemasons, a Society / Trust or an organisation with regular gatherings or meetings not open to members of the public who are not a member of the organisation.
32. In the main employees and other workers do not need to disclose membership of a Livery company, City Company without Livery, Guild or Company seeking Livery Membership, apart from senior management. (See below, Circumstances to Complete a Declaration of Interest Form).

Secondary employment, running a business, or other outside commitments

33. Employees and other workers off-duty hours are their personal concern, but they should not subordinate their duty to private interests so as to put themselves in a position where duty and private interests' conflict.
34. An employee or other worker who wishes to take up secondary employment, running a business or work (paid or unpaid), whether this is external or internal to the City Corporation (e.g. acting as an independent contractor or an independent consultant) requires Chief Officer agreement in advance.
35. An employee or other worker who wishes to take on outside commitments (e.g. becoming a school Governor in their local area, or a board member or trustee of a charity linked to the City Corporation, acting as a volunteer) requires Chief Officer's approval in advance. Refer to: Examples of Conflicts of Interest (appended) and for public duties the Special Leave and Time Off Policy.

36. When making such declarations employees and other workers must indicate the approximate time commitment involved or the relevant timescale; and must also notify of any subsequent change of circumstances.
37. The City Corporation will not automatically preclude the undertaking of additional employment, but any such employment must not, in the view of the City Corporation:
 - conflict with or react detrimentally to the City Corporation's interests, (for example, if their official duties overlap in some way with their proposed work);
 - in any way weaken public confidence in the conduct of the City Corporation's business;
 - interfere with the employee's or other worker's ability to undertake their role, e.g. cause a breach of the Working Time Directive or place demands on the individual such that they cannot perform at their full capacity for the City Corporation;
 - make use of information or material to which the employee or other worker has access by virtue of their position.
38. No outside work of any sort should be undertaken in the office or in Corporation working hours, and use of City Corporation facilities, equipment or materials. The use of telephones, photocopiers or IS systems for outside work is forbidden.
39. If there is a conflict the manager can ask for an employee or other worker to discontinue with conflicting business interests. In the event of a detrimental impact on the employee or other worker's City Corporation duties, the prior approval of a declaration does not preclude any action being taken in response to its impact on their work performance.
40. Any work undertaken on behalf of the City Corporation or which contributes to the work of the City Corporation or is requested / delivered on the basis of being an employee or other worker at the City Corporation and which attracts a fee or is paid e.g. a presentation or lecture, will need Chief Officer approval and the fees will need to be paid to the City Corporation. In the case of a Chief Officer, approval from the Town Clerk is required.
41. In circumstances where the City Corporation grants paid time off work to undertake public duties for up to 12 days maximum in any year, this requires Chief Officer approval (see the Special Leave and Time Off Policy). Where a fee is gained or allowance paid from these duties and City Corporation paid time off has been given, the fee will need to be paid to the City Corporation (e.g. a tribunal panel member day rate fee), or financial loss shown (e.g. in excess of a local councillor's annual allowance) in order to receive paid time off for Special Leave.
42. In addition, senior management are required to make disclosures or confirm a nil return on a range of specified categories, relating to their outside commitments. See below, Circumstances to complete a Declaration of Interest Form.

Sponsorship – Giving and Receiving

43. Where an outside organisation wishes to sponsor or is seeking to sponsor a City Corporation activity, whether by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts or hospitality apply. Particular care must be taken when dealing with contractors or potential contractors.
44. Where the City Corporation wishes to sponsor an event or service: neither an employee or other worker, nor any partner, spouse, relative or other person in a close relationship; must benefit from such sponsorship in a direct way without there being full disclosure to a Chief Officer. Any such disclosure should be made using the Declaration of Interest Form (Officers). Similarly, where the City Corporation through sponsorship, grant aid, financial or other means gives support in the community; employees and other workers should ensure that impartial advice is given and that there is no conflict of interest involved.

Procurement Activities and Contractors / Potential Contractors

45. At the start of each procurement exercise where a conflict arises the relevant Contract Lead/City Procurement has the responsibility to co-ordinate the timely completion of the Contract and Tendering Declaration Form (Officers) by employees and other workers involved in procurement activities i.e. benchmarking activities, specification writing, supplier identification, sourcing, evaluation and selection, decision making and governance forums. (See below, Circumstances to complete a Declaration of Interest Form).
46. Employees and other workers who engage or supervise contractors or have any other official relationship with contractors and have previously had or currently have a direct or indirect pecuniary interest with a contractor who is either engaged or proposed to be engaged by the City Corporation; they should declare that interest using the Contract and Tendering Declaration Form (Officers) at the earliest opportunity and send this to the Commercial Director for City Procurement with a copy to their line manager and Chief Officer.
47. Orders and contracts must be awarded in accordance with the principles of best value as contained in the City Corporation's Procurement Code. All procurement undertaken by the City Corporation must accord equal treatment and consideration to all organisations competing for its contracts. This involves undertaking the procurement in accordance with the rules, procedures and guidance we publish and applying them equally to all participants without favour.
48. Employees and other workers must ensure that no special favour is shown to businesses operated or controlled by, for example current or recent former employees or other workers, their partners, close relatives or associates in awarding contracts whether to businesses run by them or employing them in a senior or relevant managerial capacity.

49. Employees and other workers who are privy to confidential information on tenders or costs for either internal or external contractors must not disclose that information to any unauthorised party or organisation.
50. Where a Chief Officer in conjunction with the Commercial Director for City Procurement feels that any relationship is substantive, the Chief Officer will notify the Town Clerk who will then decide if Members need to be informed. The Chief Officer will determine any appropriate safeguards, including removing the officer in the engagement or supervision of the contractor, taking advice from the Town Clerk as appropriate.
51. Existing consultants, service providers, third party advisors may wish to express interest in contracts that the City Corporation advertises for tender, which may include projects they are already advising on. Alternatively, they may be providing advice or consultancy services to other firms who may wish to tender for the City Corporation's services. These situations naturally give rise to conflicts of interest i.e. advisors to the City Corporation are bidding directly (individually or through their company); or advising outside companies bidding for City Corporation contracts. Any such conflicts should be reported at the earliest opportunity to the Commercial Director for City Procurement, the original appointing manager (i.e. for the consultant, service provider, third party advisor) and the relevant Chief Officer; in order to assess the potential risk and impact of the conflict and determine an appropriate course of action where applicable.
52. It is not acceptable for employees and other workers with buying responsibilities to use their own, relatives or friend's personal loyalty cards while making purchases on behalf of the City Corporation or service users.

Gifts and Hospitality

53. There can be little doubt that the acceptance of gifts or hospitality by employees and other workers from persons who have, or may seek to have, dealings with the City Corporation would be viewed by the public with grave suspicion and would make the employee or other worker concerned and the City Corporation extremely vulnerable to criticism (refer to the Code of Conduct section: Bribery and Corruption).
54. An employee or other worker should tactfully refuse any personal gift which is offered to them or a close relative by, or indirectly attributable to any person or body who has, or may have, dealings of any kind whatsoever with the City Corporation or, who has applied, or may apply, to the City Corporation for any kind of decision.
55. The only exceptions to this rule are:
 - Small gifts of only token value often given by way of trade advertisements to a wide range of people, e.g. calendars, diaries, pens, pencils and similar articles of use in the workplace (up to a maximum value of £20); or

- Small gifts of only token value given on the conclusion of a courtesy visit or visit by / to dignitaries, (up to maximum value of £20).
 - Working meals which are permissible provided the employee or other worker has the approval of the Chief Officer.
 - Chief Officers or appropriate employee or other worker nominated to represent them can attend work related functions as the City Corporation representative.
56. Employees and other workers offered or in receipt of gifts in the course of their work must complete the Gifts and Hospitality Declaration Form (available on the intranet under Tools and Apps). The completed form will need to be sanctioned by the line manager in advance, unless of a tokenistic value as outlined above.
 57. If there is any doubt about whether a gift may be accepted, the gift should be politely and tactfully refused.
 58. In the event of an employee or other worker receiving a gift without warning, which does not fall in any of the exceptions mentioned above, this should immediately be reported to their Chief Officer who will be responsible for deciding whether the gift should be returned.
 59. Employees and other workers should only accept offers of hospitality if there is a genuine need to impart information or represent the City Corporation in the community, establish or maintain good business relationships, and / or improve the image and reputation of the City Corporation.
 60. Acceptance by employees and other workers of hospitality through attendance at relevant conferences and courses is acceptable where it is clear the hospitality is corporate rather than personal, where the City Corporation gives advance consent.
 61. Where visits to inspect equipment or review services by undertaking site visits etc. are required, employees and other workers should ensure that the City Corporation meets the cost of such visits to avoid jeopardising the integrity of subsequent procurement decisions.
 62. Hospitality should only be accepted where it is on a scale appropriate to the circumstances, reasonably incidental to the occasion and not extravagant; and where it is apparent that no cause could reasonably arise for adverse criticism about the acceptance of hospitality.
 63. Offers to attend purely social or sporting functions should be accepted only when these are part of the life of the community or where the City Corporation should be seen to be represented.
 64. An employee and other worker prior to receipt of any hospitality must complete the Gifts and Hospitality Declaration Form (available on the intranet under Tools and Apps). The completed form will need to be sanctioned by the line manager in advance, unless of a tokenistic value as outlined above.

65. When receiving authorised hospitality employees and other workers should be particularly sensitive as to its timing in relation, for example, to decisions which the City Corporation may be taking affecting those providing the hospitality.
66. When hospitality has to be declined the offer should be courteously but firmly declined and it should be explained to the other party the procedures and standards operating within the City Corporation.
67. Any gifts and hospitality offered but declined, unless of a tokenistic value, should be recorded on the Gifts and Hospitality Declaration Form; this ensures transparency and acts as protection for the employee and other worker concerned.

Circumstances to complete a Declaration of Interest Form

68. Employees and other workers must complete a Declaration of Interest Form (Officers), including the approximate time taken per annum or the relevant timescale where applicable, to declare:
 - **Relationships:** Employees and other workers must declare any close relationships they have with any candidates for appointments, a Member, contractor; or as a manager / supervisor with an employee and other worker or vice versa. Where such relationships exist employees and other workers must not be involved in the administration or decision-making on a matter or application on behalf of the City Corporation, nor in the provision of a reference for them to the City Corporation; both in the interest of transparency and to avoid the potential for accusations of impropriety.
 - **Personal interests:** Any financial or non-financial interests that could bring about conflict with the City Corporation's interests; for instance membership of any organisation not open to the public.
 - **Secondary employment, running a business, or other outside commitments (paid / unpaid):** Before they are entered into, together with the approximate time taken per annum or the relevant timescale.
 - **Sponsorship – Giving and Receiving:** Any benefit derived by an employee or other worker, their partners, spouse or relative or anyone else in a close personal relationship where the City Corporation gives support in the community through sponsorship or an event or service, grant aid, financial or other means.
 - **Any conflict / potential conflict of interest:** That employees and other workers self-identify as soon as they become aware of them.
69. In addition to the above, senior management are required to make disclosures or confirm a nil return on a wider range of categories than employees and other workers including the approximate time taken per annum or the relevant timescale where applicable. This is commensurate with their responsibilities for the activities of the City

Corporation, its workforce and for advising councillors on the potential implications of political decisions, these are set out below:

- **Land**², any beneficial interest in land within the area of the City Corporation.
 - **Licenses** (alone or jointly with others) to occupy land in the area of the City Corporation for a month or longer.
 - **Corporate tenancies**, where to their knowledge (a) the landlord is the City Corporation; and (b) the tenant is a body in which the employee or other worker has a beneficial interest.
 - **Securities**³, where (a) the body to their knowledge has a place of business or land in the area of the City Corporation; and (b) either: (i.) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body (whichever is the lower); or (ii.) if the share capital of that body is of more than one class, the total nominal value of the shares in any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.
 - **Membership of:** a Livery company, City Company without Livery, Guild or Company seeking Livery Membership.
 - **Think tank membership**, an organisation one of whose principal purposes include the influence of public opinion or policy and which is likely to seek to affect the policy of the City Corporation, or which may have an impact on its services or stakeholders.
 - **Membership of:** a professional association or body.
 - **Trade association membership**⁴, whether as an individual or company owner.
70. The Contract and Tendering Declaration Form (Officers) should be used to report relationships of a direct or indirect pecuniary nature with external contractors or potential contractors to the Commercial Director for City Procurement and copied to the line manager and relevant departmental Chief Officer. (See above, Procurement Activities and Contractors / Potential Contractors).
71. In the event a declaration is made that impacts on contract and/or tendering processes and outside of such processes, both the Contract and Tendering Declaration Form (Officers) and the Declaration of Interest Form (Officers) will need to be completed; and vice versa.

² 'Land' excludes any interest or right which does not carry with it a right (solely or jointly with another person) for them to occupy it or receive an income).

³ 'Securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society. A beneficial interest arises where there is a right to the economic benefit of the securities i.e. a right to the income from the securities or a share of it and a right to the proceeds of sale or part of the proceeds.

⁴ Trade association membership as either a sole trader or as a company i.e. company owner.

72. Employees and other workers should note a separate reporting process for declarations regarding the receipt or offer of hospitality and gifts, which are to be recorded using the Gifts and Hospitality Declaration Form (available on the intranet under Tools and Apps).
73. Managers may seek further advice as appropriate from Corporate HR / HR contact, Legal, Audit or Procurement according to the nature of the guidance sought.

When to complete and who should complete a Declaration of Interest Form

74. Employees and other workers should make declarations: as soon as a new matter to declare arises; a change / potential change in circumstances (including notifying their line manager and Chief Officer when there is a cessation regarding a previous declaration); and annually by specified groups of staff as set out below. If in doubt about what to disclose, the general principle should be to disclose.
75. Where an employee or other worker is in doubt as to whether they have an actual or potential conflict, they should seek advice from their line manager or Chief Officer. Employees and other workers are encouraged to err on the side of transparency and openness.
76. **A Declaration of Interest Form (Officers)** must be completed in the following circumstances:

Self-declaration	Specified staff groups	Chief Officers
<p>On joining, promotion, change of role (where applicable) and then annual reminders for all employees and other workers working for the City Corporation who must <i>self-declare</i> as soon as they become aware of a perceived, potential or actual conflict; or a change including the cessation of an existing declared conflict.</p> <p>The responsibility for avoiding any conflict of interest lies with the individual, however there will also be an annual Chief Officer reminder. See Circumstances in which a Declaration of Interest must be made above.</p>	<p>On joining, promotion, change of role (where applicable) and then annually thereafter (unless the employee or other worker notifies changes in the interim period).</p> <p>Annually following a Chief Officer communication for the following employees and other workers groups:</p> <ul style="list-style-type: none"> • Senior managers at grades I and J (including any other employees with the same level of seniority) • Sourcing, Category Management and Commercial Contract Management staff within City Procurement • City Surveyors • Internal Audit • Staff with buying responsibilities i.e. responsible for purchasing goods, services or works on behalf of the City Corporation <p>Where the employee and other worker has no declaration to make, they must submit a nil return.</p>	<p>On joining, promotion, change of role (where applicable) and then annually thereafter (unless the Chief Officer notifies changes in the interim period).</p> <p>Annually following a communication by the office of the Director of HR with returns reviewed by the Town Clerk.</p> <p>Where there are no declarations to make, they must submit a nil return.</p> <p>If a Chief Officer has a new declaration or changes to make to an existing declaration, they must self-declare these by advising the Town Clerk at the earliest opportunity. Any new work (paid/unpaid) will need to be approved by the Chief Officer's employing committee and the Establishment Committee.</p>
<p>Note: Should a declaration made on the Declaration of Interest Form also have an impact regarding contract and/or tendering processes, then that information should be recorded on both the Declaration of Interest Form (Officers) and the Contract and Tendering Declaration Form (Officers), detailed below.</p>		

77. The completed Declaration of Interest Form (Officers) is submitted to the employee or other worker's line manager for comments then referred to the Chief Officer to confirm whether the declaration is acceptable, acceptable subject to specified conditions or not acceptable and ensure the communication of their decision. The Chief Officer will make the final decision on any declarations made, seeking advice where required.
78. Each Chief Officer oversees the annual Declaration of Interest notification reminder process⁵ within their department. Whereas Corporate HR / HR Contact will issue the Declaration and Register of Interest Form for new starters at the conditional offer stage of recruitment or as a result of a promotion or change of role. The returned form will be passed to the appointing manager which is normally the line manager for processing, and then referred on to the Chief Officer as described above.
79. Similarly, each Chief Officer will complete a Declaration of Interest Form to make a new declaration or changes to an existing declaration; to be approved by the Town Clerk. Any new work (paid/unpaid) will need to be approved by the Chief Officer's employing committee and the Establishment Committee.
80. **A Contract and Tendering Declaration Form (Officers)** must be completed as detailed below:
- Annually by Sourcing, Category Management and Commercial Contract Management staff within City Procurement, who must also notify as soon as a conflict of interest arises or changes to line management during the year.
 - Annually by all City Surveyors staff, who must also notify as soon as a conflict of interest arises or changes to line management during the year.
 - At the start of each procurement exercise, declarations of interests by employees and other workers involved should be recorded in the minutes of meetings with City Procurement staff and any external procurement advisors. If a conflict arises, then a declaration form should be completed.
81. Should a declaration made on the Contract and Tendering Declaration Form (Officers) also have an impact outside of contract and/or tendering processes, then that information should also be recorded on the Declaration of Interest Form (Officers), detailed above.
82. **A Contract and Tendering Declaration Form (External)** is required to be completed by existing consultants, service providers and third-party advisors to declare any conflicts of interest at each procurement exercise. For further advice refer to City Procurement.

⁵ The office of the Director of HR co-ordinates Chief Officers' Declarations of Interest process.

Circumstances to complete a Register of Interest Form

83. Chief Officers must also complete a Register of Interest Form to declare the nature of involvement and the approximate time spent on: outside paid work, voluntary work and interests affecting their working life. Where they have no declaration to make, they must submit a nil return.
84. Chief Officers must complete the Register of Interest Form (Chief Officers) annually, the administration for this process is co-ordinated by the office of the Director of HR, and the form is reviewed by the Town Clerk. The Director of HR then reports on the Chief Officers Register of Interests to the Establishment Committee. This information becomes part of the public record, as named individual records are available in open committee papers.
85. However, if there are any new declarations to be made in the intervening time these must be declared at the earliest opportunity and the same principles apply. Any new work (paid/unpaid) will need to be approved by the Chief Officer's employing committee and the Establishment Committee.

Raising Concerns and Whistleblowing

86. The City Corporation is committed to the highest possible standards of probity. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about the conduct of any aspect of the City Corporation's work to come forward and voice those concerns to us. It is recognised that most cases will have to proceed on a confidential basis.
87. Where employees or other workers have concerns around misconduct or the lawfulness of any action or proposed action, they should raise their concerns to the appropriate manager or Chief Officer without delay.
88. The Whistleblowing Policy is also available to employees and other workers who feel they need to raise an issue outside of the management chain. Any suspicion of wrongdoing will be treated seriously and will be reviewed and analysed in accordance with the Whistleblowing or Complaints Policy, considering the Public Interest Disclosure Act, the Human Rights Act and if appropriate the City Corporation's Anti-Fraud and Corruption Strategy.
89. City Corporation employees, agency workers, and contractors should be aware that they have statutory protection against victimisation and dismissal under the Public Interest Disclosure Act 1999 (PIDA)⁶, if they speak out genuinely against corruption and malpractice at work (see, Regulation of Investigatory Powers Policy and

⁶ PIDA was further strengthened by the Enterprise and Regulatory Reform Act 2013.

Procedure). Further information on how to make a disclosure is contained in the Whistleblowing Policy.

List of Appendices

Conflicts of Interest, forms and guidance:

- Appendix 1 - Declaration of Interest Form (Officers)
- Appendix 2 - Contract and Tendering Declaration Form (Officers)
- Appendix 3 - Register of Interest Form (Chief Officers)
- Appendix 4 - Declaration and Register of Interests FAQ's
- Appendix 5 - Examples of Conflicts of Interest
- Appendix 6 - Managers Guide, Declaration and Register of Interests

Links / Other resources

- Anti-Fraud and Corruption Strategy
- Code of Conduct
- Data Protection Policy (includes the Employee Privacy Notice)
- Disciplinary Procedure
- Employee Privacy Notice
- Equal Opportunity Policy
- Financial Regulations
- Gifts and Hospitality Declaration Form
- Politically Restricted Posts Policy
- Procurement Code
- Protocol on Member/Officer Relations
- Recruitment and Selection Policy
- Regulation of Investigatory Powers Policy and Procedure
- Special Leave and Time Off Policy
- Whistleblowing Policy