

London Borough of Barnet

Code of Conduct for Officers

1. Introduction

- 1.1 Council employees are delivering a service to the public using taxpayers' money, and as such the council expects them to exhibit exemplary standards of behaviour and conduct. Employees are expected to adhere to the seven Principles of Public Life (the "Nolan Principles"):
- **Selflessness** – acting solely in the public interest
 - **Integrity** – avoiding conflicts of interest and undue influence
 - **Objectivity** – taking decisions impartially without discrimination or bias
 - **Accountability** – being open to scrutiny
 - **Openness** – being transparent about decisions and actions
 - **Honesty** – truthful at all times
 - **Leadership** – exhibit the right behaviours and challenge poor conduct
- 1.2 Where a member of staff believes there is or may be a conflict of interest affecting their ability to work in this way, the expectation is that they will declare this potential conflict in a timely manner, and before it comes to light by some other means. Failure to make a declaration where there is subsequently discovered to be grounds for doing so, may be treated as a disciplinary issue.
- 1.3 In addition to the duties of their post, Council employees have an obligation to comply with statutory duties as set out in relevant legislation including (but not limited to), the Data Protection Act 2018 and the Equality Act 2010.
- 1.4 The National Joint Council for Local Government Services (the Green Book) and the Constitution Salaries Conditions of Service (Joint Negotiating Committee for Chief Officers of Local Authorities) states: "Employees will maintain conduct of the highest standards that public confidence in their integrity is sustained. Local codes of practice will be developed to cover the official conduct and the obligations of employees and employers."
- 1.5 This Code of Conduct applies to all employees under a contract with the council. Governing bodies of non-community schools and partner organisations in receipt of public funds should be encouraged to adopt this Code of Conduct.

2. Standards

- 2.1 Council staff are expected to give the highest possible standard of service to the public, and to provide appropriate advice to Councillors and fellow members of staff with impartiality. They will be expected to raise matters without fear of recrimination to their manager or Senior manager or if they do not wish to do that, to bring it to the attention of the Chief Executive or make a report via the whistle blowing policy. In the event that the matter relates to the Chief Executive it should be raised with the Council's Monitoring Officer.

2.2 Safeguarding responsibilities - All staff share responsibility for safeguarding and promoting the welfare of children, young people and vulnerable adults. Staff are expected to report any incidents or concerns that cause you to believe that a child, young

person or vulnerable adult is, or is likely to be, at risk of harm. This includes responsibility to report if you suspect that a child or adult at risk may be under the influence of radicalisation, extremism, forced marriage or modern slavery.

3. Council Information

- 3.1 The Council's policies on information management and security can be found on the staff intranet. These policies outline responsibilities for the management and security of Barnet Council information. It is a condition of employment at Barnet Council that staff work at all times in accordance with these policies. The policies may be amended and added to from time to time and the intranet site will show the most recent policies which staff must observe. Line managers are responsible for ensuring that staff are supported in complying with council information management (IM) policies and they should identify to their line manager any concerns that prevent compliance with the policies. The council will consider very seriously any alleged breaches of these policies which may be dealt with under the Council's Disciplinary Procedure. Employees are required to complete training periodically on this subject.
- 3.2 It is generally accepted that open and transparent government is best. The law requires that certain types of information must be available to elected members, auditors, government departments, service users and the public. The Council itself may decide to be open about other types of information. Staff must be aware of the authority's policies and of their duties in relation to the handling of both personally and commercially sensitive information. If in doubt guidance should be sought from management before information is disclosed.
- 3.3 The council has a process for dealing with information requested under the Freedom of Information Act. All requests made under the FOI legislation must be passed to the FOI team where they will be logged and tracked. Each directorate has an FOI Link Officer responsible for co-ordinating responses and ensuring that the directorate is compliant.
- 3.4 Staff should not use any information obtained in the course of their employment that is not in the public domain for personal gain or benefit, nor should they pass it on to others who might use it in such a way.
- 3.5 Information received by an employee from a Councillor which is personal to that Councillor and does not belong to the Authority should not be divulged by the employee without the prior approval of that Councillor, except where such disclosure is required or sanctioned by the law.

4. Political neutrality

- 4.1 Staff must conduct their council duties in a politically neutral manner without regard to their personal political persuasions. This includes such matters as email sign offs promoting political organisations.
- 4.2 They must serve all Councillors and not just those of the controlling group and must ensure that the individual views of all Councillors are respected.
- 4.3 Subject to the authority's conventions, staff may also be required to advise political groups, in ways which do not compromise their political neutrality.
- 4.4 The council maintains a list of politically restricted posts. Holders of posts designated politically restricted will have this stated in their contract. They have limitations placed upon them in terms of active membership of political parties or holders of office within them. They are restricted to membership of a political party without playing any active

role within the party or undertaking any canvassing.

- 4.5 Staff, whether or not politically restricted, must follow every lawful expressed policy of the authority, regardless of their personal or political opinions

5. Relationships

5.1 Councillors

- 5.1.1 Staff are responsible to the authority through its senior managers. For some, their role is to give advice to Councillors and senior managers and all are there to carry out the authority's work. Mutual respect between staff and councillors is essential to good local government. Close personal familiarity between staff and individual Councillors can damage the relationship and prove embarrassing to other staff and Councillors and should therefore be avoided.
- 5.1.2 No personal matters to do with an employee's job should be raised with Councillors directly, but should be referred through the accepted Council procedures. In the same way, allegations or claims about other employees should be referred to the appropriate manager and not raised directly with Councillors. Employees should not use Councillors to by-pass formal Council procedures in any way, for example, to influence the outcome of a disciplinary action.
- 5.1.3 The council has protocols and etiquette around working with Councillors and managers should ensure new recruits are aware of these.

5.2 The Local Community and Service Users

- 5.2.1 Staff should always remember their responsibilities to the community they serve and ensure courteous, efficient and impartial service delivery to all groups and individuals within that community as defined by the policies of the authority.

5.3 Contractors

- 5.3.1 All relationships of a business or private nature with external contractors, or potential contractors, should be made known to the appropriate manager. Orders and contracts must be awarded on merit, by fair competition against tenders and no special favour should be shown to businesses run by, for example, friends, partners or relatives in the tendering process. No part of the local community should be discriminated against.

5.4 Soliciting or being solicited for employment

- 5.4.1 Where Council staff engage in discussions about future employment with any organisation, contractor or partner with whom the council either has a contractual relationship or is in the negotiation stages of a possible contractual arrangement then this must be declared prior to being developed further to the Head of Service or Chief Officer as appropriate, or Chief Executive where the person is themselves a Head of Service or Chief Officer. The Council reserves the right to temporarily redeploy staff to a suitable alternative post where such discussions are taking place.
- 5.4.2 Managers will make a note of relationships and personal interests, declared to them by staff, any risks identified and the mitigating action taken and send this note to the Human Resources unit who will keep this information on the employee's personal file.

5.5 Recruitment, Employment and promotion of Relatives

- 5.5.1 Staff involved in all types of recruitment, whether to permanent, fixed term or casual roles, should ensure that these selection decisions are made on merit. It would be

unlawful for an employee to make an appointment or promotion which was based on anything other than the ability of the candidate to undertake the duties of the post.

5.5.2 The Council recognizes that employees are entitled to privacy in their personal affairs and have the right to enjoy a private life. However, all employees are expected to avoid placing themselves in situations in which their personal relationships may create actual or perceived conflicts of interest. Such conflicts could occur in the following situations. However, these are illustrative and not exhaustive:

- Applying for a position at the council without declaring a relationship with a councillor or existing officer
- Being involved in recruitment or promotion decisions where candidates are relatives or close friends
- Being involved in tendering processes where potential tenderers are closely related or where a financial interest exists
- Commencing a relationship with a colleague where that relationship could create conflicts of interest (e.g. between a line manager and employee) - in such cases employees are required to notify their senior manager

5.5.3 In all cases, employees should seek advice where a potential conflict of interest may occur. Such advice can be obtained confidentially from Human Resources or the Monitoring Officer

5.5.4 The same standards should be applied to the selection and appointment to interim, agency, contractor or consultancy opportunities.

6. Additional Employment

6.1 Staff should be clear about their contractual obligations and should not take outside employment or engage in any business which conflicts with the authority's interests.

6.2 Staff must not use the Council's contacts and suppliers in order to set up a venture on their own account, in competition with or to the detriment of the council.

6.3 Current policy in Barnet (but subject to each individual case being considered on its merits and in accordance with the Council's procedures), states that in order to avoid any conflict of interests, all staff involved in any proposed Management Buy Out be given unpaid leave of absence pending a conclusion or, if directly involved in negotiating the buy out, be suitably separated from any conflicts of interest that may arise.

6.4 Staff must not take up any other employment or engage in any business without written approval.

6.5 Approval to undertake additional employment or engage in any business will depend on the circumstances of the Officer's particular situation. Any additional employment must not in the view of the Authority be likely to conflict with or be detrimental to the Authority's interests or in any way weaken public confidence in the conduct of the Authority's business. Situations where staff fail to seek permission or disclose details of their additional employment will be dealt with under the Council's Disciplinary Rules and Procedure and could result in the employee's dismissal for gross misconduct.

6.6 Assistant Directors and above are empowered to decide whether officers should be permitted to take up part-time employment or engage in any business in addition to their full or part-time appointment with the council. The decision in this respect should be

communicated in writing to the employee concerned. A copy must be placed in their personal file. Requests from AD and above should be referred to the Chief Executive for a decision.

6.7 With regard to holders of job share or part-time posts, each case will be looked at on an individual basis by the AD or Chief executive as appropriate.

6.8 Employees may, and are encouraged to, take up unpaid roles, such as being trustees or governors. However, they should still declare the role as an interest, and must seek approval from their chief officer if the time commitment required for the role is likely to impact on their employment (see below)

6.9 Where in doubt, staff should seek advice from their AD, [Director](#) or Chief Executive.

7. Intellectual property

7.1 Intellectual property is a generic term that includes inventions, applications, programmes, creative writings and drawings. If these are created by the employee during the course of employment, then as a general rule they belong to the employer. However, various Acts of Parliament cover different types of intellectual property.

8. Inventions and Patents

8.1 Under the Patents Act 1977 inventions are the property of the employer if they have been made either

8.2 in the course of the employee's normal duties or in the course of duties specifically assigned to the employee falling outside their normal duties, and in both cases where invention might reasonably be expected;

8.3 in the course of the employee's duties and at the time the employee had (because of the nature of his or her duties and particular responsibilities arising from them) a special obligation to further the interests of the employer.

9. Conflict of interest

9.1 Staff must declare any non-financial interests that they consider could bring about conflict with the authority's interests e.g. involvement with an organisation or pressure group which may seek to influence their authority's policies or acting as a School governor within schools maintained by the authority.

9.2 Where a worker believes there is or may be a conflict of interest affecting their ability to work in this way, the expectation is that they will declare this potential conflict in a timely manner, and before it comes to light by some other means. Failure to make a declaration where there is subsequently discovered to be grounds for doing so, will be treated as a disciplinary issue.

9.3 Further guidance notes will be issued with the declaration form that will be used to declare interests, to distinguish the types of membership of groups that require to be declared. It is not intended for staff to declare membership of legitimate political parties or Trade Unions.

9.4 Any interests, financial or otherwise which could conflict with the authority's interests must be declared e.g. involvement with an organisation applying for or receiving grant aid from the authority, or involvement with an organisation that is seeking to contract with the council or is already a contractor or client. It is accepted that some staff may be members of organisations and groups and have no active involvement in the group.

However, there is an expectation that where an employee is involved in the running of the group or organisation, has a financial interest or otherwise, or is involved as a Committee member, or in the decision making process, that this would be declared. Likewise those who are asked to undertake work in response to a request from a group or organisation of which they are a member would be wise to declare their membership.

- 9.5 Staff must declare membership of any organisation not open to the public without formal membership and commitment of allegiance and which has secrecy about rules, membership or conduct.
- 9.6 The completed declaration of interest form will be reviewed by an appropriate AD to consider any action that may be necessary before being placed on the employee's personal file.
- 9.7 The declaration of interest is not a historical document to reflect the situation at time of entry to the council's employment, rather an evolving document that must be kept up-to-date. It is the responsibility of the employee to ensure that as their circumstances change during the time of their employment that they keep their declaration up-to-date. Should an employee need to amend or review a declaration they must contact HR and complete a new declaration and send this to the appropriate AD for review before it is placed on personal files.
- 9.8 Declaration forms are securely stored and would not be open for inspection to staff, other than by their Senior Managers (at AD level) or HR. These managers/HR may need to check declaration forms should either membership of an organisation or pressure group emerge or, should there be suspicion that a relationship has emerged which was relevant to the staff member's duties and is contrary to the Code of Conduct. FOI requests relating to such information, would be redacted to ensure identifying information is excluded..
- 9.9 Any member of staff who is in any doubt as to whether or not specific outside interest exists and should be declared should contact their AD for guidance.
- 9.10 All staff involved in procurement activity should ensure that they are familiar with procurement policies and procedures, especially with regard to conflicts of interests and make declarations of interests as appropriate.

10. Separation of Roles During Tendering

- 10.1 Staff involved in the tendering process and dealing with contractors should be clear on the separation of client and contractor roles within the authority. Senior staff who have both a client and contractor responsibility must be aware of the need to demonstrate accountability and openness.
- 10.2 Staff in contractor or client units must exercise fairness and impartiality when dealing with all customers, suppliers other contractors and sub-contractors.
- 10.3 Staff who are privy to confidential information on tenders or costs for either internal or external contractors should not disclose that information to any unauthorised third party or organisation.
- 10.4 Staff should ensure that no special favour is shown to current or recent employees and workers or their partners, close relatives or associates in awarding contracts to businesses.

11. Workers and Residents

- 11.1 In circumstances, where an London Borough of Barnet (LBB) worker who is also a resident

of LBB wishes to make an opinion about the policies being followed by the Council then such expressions of opinion must make clear that the person concerned is expressing an opinion as a resident of LBB and not as a Council worker.

- 11.2 The worker must ensure that they do not divulge any information that is not already in the public domain.
- 11.3 Where opinions are expressed on TV, film, website, social networking site or in photographs, the worker must not wear any badges or clothing which would readily identify the individual as a worker at the Council.
- 11.4 Should a worker express an opinion without making clear that he or she is making that opinion as a resident of LBB or he or she is wearing badges or clothing that readily identifies the individual as a worker at the Council, he or she may be subject to a disciplinary process.
- 11.5 Notwithstanding the above, employees should not, in any circumstances, act in a way that would bring the council into disrepute, and to do so would be a disciplinary matter.
- 11.6 Council staff who are Trade Union officials must not make statements about council business without making it clear that this is in their official union capacity in accordance with agreed working protocols.

12. Equality Diversity and Inclusion (EDI)

- 12.1 The council is committed to promoting equality, diversity and inclusion, and expects all of its employees to act in a way that supports this. As well as complying with all aspects of the Equality Act 2010, employees are also expected to support the Council's 6 Equality, Diversity and Inclusion (EDI) workforce goals:
 - 12.1.1 We have an inclusive culture, based on an empathic understanding of people's life situations and lived experiences
 - 12.1.2 Our workforce is representative of the communities we serve, at all levels
 - 12.1.3 Our working environment is safe and supportive, free from discrimination, bullying, harassment and micro-aggressions, where all staff can bring their whole selves to work
 - 12.1.4 All staff are given the opportunity to grow and develop
 - 12.1.5 Barriers to equality are better understood and eliminated
- 12.2 Equalities, diversity and inclusion are promoted at all levels of the council, internally and externally
- 12.3 All staff should ensure that policies relating to equality issues as agreed by the authority are complied with in addition to the requirements of the law.
- 12.4 All members of the local community, customers and other employees and workers have a right to be treated with fairness and equity.

13. Use of Financial Resources

- 13.1 Staff must ensure that they use public funds entrusted to them in a responsible and lawful manner. They should strive to ensure value for money to the local community and to avoid legal challenge to the authority.
- 13.2 In addition, staff must consider financial matters solely with regard to the public interest and in accordance with the council's financial regulations.

14. Fraud, Bribery and Corruption

14.1 These are serious criminal offences.

14.2 The council is under a duty to protect public funds it administers. To this end any information which the council obtains as a consequence of your employment may be used for the detection of fraud. The information may, where necessary, be used by the council and provided to other bodies administering public funds for the detection of fraud.

14.3 It is also a serious criminal offence in an official capacity, to offer or receive a bribe, or corruptly receive or give any gift, loan, fee, reward or advantage for doing, or not doing, anything, or showing favour or disfavour, to any person, group or organisation. If it is proved that some kind of reward was given to or received by the employee, then the onus is on the staff member to disprove corruption.

14.4 Suspicions of Fraud, Bribery or Corruption must be referred to the Councils Corporate Anti-Fraud Team (CAFT) for investigation. Such matters can also be raised under the council's whistle blowing Policy by workers

15. Gifts, Hospitality and Sponsorship

15.1 In the course of their work for or on behalf of the Council staff may be offered gifts, hospitality or sponsorship by contractors, consultants, clients or other members of the public. In some instances, accepting such gifts could place staff in a serious predicament, open to allegations of bribery and corruption, disciplinary proceedings and or criminal investigation.

15.2 These guidelines are designed to protect workers from such allegations, proceedings or investigations. It is essential that workers are open, and not secretive in their relationships with outside agencies and at all times act in a manner that will protect the integrity and reputation of the Council. Under no circumstances should gifts, hospitality or sponsorship be accepted to give personal, commercial, regulatory or contractual advantage (acceptance of bribes). All workers are required to have an understanding and awareness of the Counter Fraud Framework – Bribery Policy Statement and Procedure.

15.3 Offering or accepting bribes is a matter to be investigated by the Corporate Anti Fraud Team (CAFT) and could result in prosecution.

15.4 Staff should not routinely accept gifts and hospitality.

15.5 Any gift, hospitality or sponsorship that is offered in connection with work undertaken for the council (whether accepted or not) must be recorded in writing, immediately on receipt, or offer, on the Hospitality, Gifts and Sponsorship Declaration Form. For the avoidance of doubt, it is required to fully complete the declaration form on each and every occasion that an offer of a gift, hospitality or sponsorship is made, unless there is an exemption for gifts, etc. below a specified value threshold.

15.6 After completion, the declaration form must then be passed immediately to the line manager. Once the line manager has completed their section they should then immediately pass the declaration form to the council's Monitoring Officer. The Monitoring Officer will consider if further action is appropriate. The Monitoring Officer will then pass the declaration form to a Governance Officer for inclusion in the central register recording receipt/offers of gifts, hospitality and sponsorship to Council officers. In the interests of transparency the council may publish the "gifts hospitality and sponsorship" register, but will delete personal data, where it is appropriate to do so.

- 15.7 **Minor gifts/hospitality under £25**, e.g. calendars, diaries, stationery items, need not be recorded. The same applies to the receipt of minor hospitality e.g. tea and biscuits. Where unsolicited gifts, with a value of less than £25, such as a bottle of wine, food, confectionery, etc are offered, these can be accepted, and if not capable of sharing with colleagues, residents/users (e.g. of a social services' establishment), they should be donated to the Mayor's charity. Staff should declare multiple gifts received (in a period of 12 months) from the same donator/company whether or not they exceed £25.
- 15.8 **Gifts of higher value**, e.g. cases of spirits, clothes, jewellery, holiday bookings, holiday discounts and electrical equipment, must not be accepted and, if received, should be returned to the sender, but must still be recorded on the declaration form as having been received and returned unused or as directed by the Head of CAFT (to whom such gifts must be separately reported by you)
- 15.9 **Cash, Cheques, Money Orders** or any monetary form offered to or received as a gift or otherwise must not be accepted, under any circumstance, and any such offers must still be recorded on the declaration form as having been received and returned unused or as directed by the Head of CAFT (to whom such offer or receipt must be separately reported by you)
- 15.10 **Discounts** - It is not permitted, on a personal basis, take advantage of discounts which have been offered or negotiated by the Council with its suppliers for the purchase of goods, materials or services, unless the discount has been negotiated specifically as a benefit available to all staff or to a specific group of staff (of which the individual claiming the discount is a member).
- 15.11 **Hospitality** - The Council recognises that from time to time there is a need for certain officers to attend business functions where they may receive hospitality in the form of light refreshments, drinks and/or meals. Such hospitality may be accepted when provided in the course of normal business - e.g. lunch at a contractor's expense during a business meeting or function, provided that it is recorded in the gifts, hospitality and sponsorship register (subject to the exemption for minor hospitality previously referred to). If the offer of alcohol is accepted, vehicles must not be driven until an appropriate time has elapsed for the alcohol to have left the system. Individuals should consider whether the acceptance of hospitality could affect or may reasonably be perceived as likely to affect the outcome of a business transaction involving the Council or may otherwise be reasonably perceived as not appropriate and/or not bona fide expenditure.
- 15.12 **Prestige Events** - Invitations to prestige events, such as Wimbledon and Royal Ascot and other events such as football matches, theatre, opera, or weekend breaks must not be accepted, and offers must be recorded on the declaration form. Consideration may be given to attendance at certain events if that attendance is in connection with the business purposes or otherwise in the interests of the Council, but authorisation must be obtained from your line manager and approved by the Monitoring Officer before any attendance and this must be recorded on the declaration form.
- 15.13 **Sponsorship** - Attendance at sponsored conferences and other business related events would be permissible provided that such attendance is either necessary for the business purposes or otherwise in the interests of the Council or it is normal practice for officers in local authorities or other public bodies to attend. Attendance must be recorded on the declaration form.
- 15.14 **Council workers providing personal care**, such as Care Workers, Home Helps and

Wardens of sheltered housing accommodation can sometimes be offered jewellery, money or other gifts, or bequests of substantial value by clients. There are special considerations when dealing with elderly, confused or otherwise vulnerable clients, as accepting such gifts may place staff in a vulnerable position. Any such offers from clients, or their relatives, friends or other members of the public, must be reported immediately to the line manager. Where-ever possible gifts from clients should be refused, and they may only be accepted if to refuse would give offence, they are under the value of £25, a declaration form has been completed (even though below the normal value threshold) and with the prior consent of the employee's line manager and the Monitoring Officer.

15.15 **No gifts or hospitality are to be accepted from contractors who are considering or submitting a tender during a tendering period.**

15.16 Records may be subject to inspection.

15.17 Failure to adhere to this code of practice will be regarded as gross misconduct and could lead to dismissal.

16. Sponsorship – Giving and Receiving

16.1 Where an outside organisation wishes to sponsor a local government 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.

16.2 Where the authority wishes to sponsor an event or service neither an employee nor any partner, spouse or relative must benefit from such sponsorship in a direct way without there being full disclosure to an appropriate manager of any such interest. Similarly, where the authority through sponsorship, grant aid, financial or other means, gives support in the community, staff should ensure that impartial advice is given and that there is no conflict of interest involved.

17. Use of Internet, Intranet and e-mail facilities

17.1 The council's electronic assets, including PC/laptop/phone, e-mail, Internet web access and Intranet facilities are provided to assist council business and are not intended for personal use. (See the Information Governance (IG) policies and procedures for detailed guidance).

17.2 Accessing, storing or transmitting offensive material via e-mail, the Internet or the Intranet is expressly prohibited. Offensive material includes, but is not limited to, pornographic, racist, terrorist and sexist material.

17.3 The usage of web and e-mail addresses will be logged and audited on a regular basis. Any apparent misuse of these facilities may lead to disciplinary action being considered.

17.4 Up-to-date information on the council's Acceptable Use Policy is available on the Internet and should be regularly reviewed by users of the council's Internet and Intranet facilities. The use of all social media by workers of the council, including the use of authorised and personal social media channels, must be in accordance with the specific terms and general spirit of the Code of Conduct that requires staff to exhibit exemplary standards of behaviour. In particular, the use of social media must comply with the terms of section 3 (Council Information), section 10 (Workers and Residents) and section 17 above (Use of Internet, Intranet and email facilities). For the avoidance of doubt, social media may not be used in any way that:

- 17.4.1 Breaches the security of Barnet Council information, as set out in the council's information management policies, including the transference of information to third parties and/or third party social media channels.
- 17.4.2 Makes unauthorised comments on council policy or business in any way that may be construed as being made by a representative or worker of the council.
- 17.4.3 Brings the council into disrepute
- 17.5 Circumvents or otherwise inhibits the council's whistleblowing policy and management thereof.
- 17.6 Failure to comply with any of the above will be fully investigated under appropriate policies and could result in disciplinary action.

18. Smoking, Alcohol and Substance misuse

- 18.1 Smoking in or in the immediate vicinity of Barnet offices is strictly prohibited. Smoking in work vehicles or vehicles that will carry members of the public is also prohibited. E-Cigarettes are treated exactly the same as cigarettes or cigars. Please see Smoking at Work Policy for full details.
- 18.2 The consumption of alcohol, drugs or substances (except medically prescribed drugs) are strictly prohibited during working time. Staff at business related engagements outside of working time are representing the council as ambassadors and as such are expected to keep any alcohol intake within recommended daily guidelines. Problem drinking is an illness or could be related to a mental health problem and the individual concerned should be encouraged to seek appropriate support. Employees who drive for work or who carry out safety critical tasks must never drive or work while under the influence of alcohol drugs or substances. Please see Alcohol, Drugs and Substance Misuse Policy for full details.

18.19. Application of the Code of Conduct

- 19.1 There will be specific mention of the Code of Conduct in the contract of employment for new starters and that they could be required to declare interests after the selection process but before taking up their posts.
- 19.2 Any apparent breaches of this Code of Conduct will be fully investigated by the appropriate manager and any proceedings would follow the normal disciplinary procedures of the Council and in serious cases could also result in prosecution.
- 19.3 If anyone has any concerns about improper conduct or malpractice or abuse within the Council or to any of its service users and wish confidentiality when reporting a concern, they are encouraged to use the whistleblowing policy which can be found on the intranet in the HR Staff Handbook section.

19.20. Criminal Offences

- 20.1 It is a condition of employment that employees notify their manager immediately if they are charged, cautioned or convicted of a criminal offence, including offences against children. Personal information which you supplied to the Council will be stored on computer systems and will, therefore be subject to the provisions of the Data Protection Act 2018.

Hospitality, Gifts and Sponsorship Declaration Form (Page 1 of 2)

NB this will be an online process

| |
|---|
| Date hospitality, gift or sponsorship offered/received: |
| Name of person offered/receiving the hospitality, gift or sponsorship: |
| Work address: |
| Directorate: |
| Hospitality, gift or sponsorship received from: |
| Details of hospitality, gift or sponsorship offered/received: |
| Approximate value of hospitality, gift £ or sponsorship offered/received: |
| Declaration: <i>(please delete as appropriate)</i> 1 The hospitality, gift or sponsorship was offered but was declined. 2 I declare that the gift/hospitality/sponsorship has been/will be accepted and is entirely consistent with the requirements of the Council's Code of Practice on Gifts, Hospitality and Sponsorship and that no business decisions have or will be influenced by the acceptance and that no advancements or personal gain have been or will be obtained. 3 I confirm that I have read and understand the Code of Practice on Gifts, Hospitality and Sponsorship and the Bribery Policy Statement and Procedure <i>– Counter Fraud Framework and have made all necessary declarations during the last year.</i> |
| Print Name: |
| Signed and dated: |
| (If the declaration is made by e-mail, state by e-mail in the signature box above) |

Hospitality, Gifts and Sponsorship Declaration Form (Page 2 of 2)

| | |
|--|--|
| <p>Managers Statement:</p> | <p>I confirm that I have been made aware of the stated hospitality, gift or sponsorship that has been offered to or received by the above named member of staff for whom I have line management responsibility. I consider the action taken by the member of staff to be reasonable and it has my approval/ I have taken the following action with regard to the matter:</p> |
| <p>Print Name:</p> | |
| <p>Signed and Dated:</p> | |
| <p>Monitoring Officer statement:</p> | <p>I confirm that I have been made aware of the stated hospitality, gift or sponsorship that has been offered to or received by the above named member of staff. I have taken account of the line manager's comments. I consider the action taken by the member of staff to be reasonable and it has my approval / I have taken the following action with regard to the matter:</p> |
| <p>Print Name:</p> | |
| <p>Signed and dated:</p> | |
| <p>To be completed by Governance Officer as confirmation of inclusion in register Print Name</p> | |
| <p>Signed and dated</p> | |

Declaration of Interest Form Definition

If a member of staff is a close relative, a friend, a personal acquaintance, a Councillor or have had any form of relationship either present or past, the relationship must be declared to the Assistant Director or Director.

- The relationship must be declared to the Director for them to review the information detailed on the form and make an informed decision on any action to be taken.
- **For example:** make a change to line management responsibilities, review interview panel members, change decision making responsibilities for employment by instructing the employee **not** to be involved in any recruitment and selection decision, pay including provision of overtime, grading, training, appraisal, disciplinary, grievance decisions.
- If you **fail to seek permission or disclose details** of any relationship it could be dealt with under the Disciplinary procedure and **could** result in dismissal

I declare that I have a “close relationship” with

Decision and rational made by Director

| | |
|--|--|
| Name of employee | Signed by employee |
| Declaration of conflict of interest has been declared, considered and instructed as above. | Signed: Assistant Director/Director |

Once complete scan and send to HR in Belfast Barnet HR & Payroll (barnethrpayroll@capita-services.co.uk)