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Appendix 1

EMPLOYEE CODE OF CONDUCT

1.0 Introduction

1.1 It is desirable for the protection of the public and the protection of employees that guidance be given to local government employees as to the conduct expected of them. This Code provides guidance to assist councils and their employees in their day to-day work and sets out the minimum standards of behaviour expected.

1.2 The aim of the Code is to set guidelines for Council employees which will help maintain and improve standards and protect employees from criticism or misunderstanding.

2.0 Framework for the Code

2.1 The public is entitled to expect the highest standards of conduct from all employees who work for Dacorum Borough Council (the Council) and this Code has been developed in line with best practice, existing legislation and the following guidance.

2.2 The provisions of this Code apply to all staff employed by the Council in the performance of their duties on a day-to-day basis including any additional offices to which they may be appointed in their capacity as a district council employee.

2.3 National Agreement on Pay and Conditions of Service (the National Agreement)

2.3.1 The basic principle is stated in Part 2 paragraph 2, Key National Provisions of the National Joint Council for Local Government Services, National Agreement on Pay and Conditions of Service (the National Agreement):

- ***Official Conduct***

- Employees will maintain conduct of the highest standard such that public confidence in their integrity is sustained; and*

- Local codes of practice will be developed to cover the official conduct and the obligations of employees and employers.*

2.3.2 Similar provisions are incorporated in the National Conditions of Service of Chief Officers.

2.4 Seven Principles of Public Life

2.4.1 This Code builds on, and is in keeping with, the seven principles of public life articulated by the Nolan Committee on Standards in Public Life (established in October 1994) which emphasises that those in public life should:

- ***Selflessness*** take decisions based solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their families, or their friends.

- **Integrity** not place themselves under any financial or other obligation to outside individuals or organisations that might influence them in the performance of their official duties.
- **Objectivity** in carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
- **Accountability** are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
- **Openness** be as open as possible about all the decisions and actions they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
- **Honesty** have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- **Leadership** promote and support these principles by leadership and example.

3.0 Standards of Behaviour, Impartiality and Conflicts of Interest

- 3.1 Council employees are expected to conduct themselves with integrity and honesty in carrying out their duties and must provide the highest possible standard of service to the public.
- 3.2 Where it is part of their duties to provide appropriate advice to councillors and fellow employees this must be done with impartiality at all times.
- 3.3 Employees will be expected, without fear of recrimination, to bring to the attention of the appropriate level of management any deficiency in the provision of service (see paragraph 15.1. *Whistleblowing*).
- 3.4 Responsibility is placed on every member of staff for disclosing to an appropriate manager or officer of the Council every potential conflict of interest in which he/she may be involved.
- 3.5 In general employees' private interests must not be such as to have the potential for allegations of impropriety or partiality to be sustained thereby bringing the Council into disrepute. This includes standards of behaviour outside the working environment and in the use of social media in relation to elected members, fellow officers and the general public.

- 3.6 Employees should not misuse their official position or information acquired in their official duties to further their private interest or those of others.
- 3.7 Employees must report to the appropriate manager any impropriety or breach of the terms of this Code.
- 3.8 Employees should have regard to the Council's Corporate Priorities and Corporate Plan when undertaking their duties and should make their line manager aware of any circumstances where these aims and objectives might not be able to be followed.

4.0 Disclosure of Information

- 4.1 The law requires that certain types of information must be available to members, auditors, government departments, service users and the public. The Council itself may also decide to be open about other types of information.
- 4.2 The Council will therefore make clear to employees:
- the types of information which must be made available, and to whom;
 - the types of information which the Council has voluntarily made open, and to whom;
 - the types of information which the Council does not wish to be disclosed without specific permission.
- 4.3 The law also requires that personal information held about individuals must be treated in accordance with Data Protection legislation. Employees must ensure that they process data lawfully in accordance with the data protection principles. The Freedom of Information Act 2000 also gives a right of access to information held by public authorities in accordance with the provisions of the authority's publication scheme.
- 4.4 Employees should not use any information obtained in the course of their employment for personal gain or benefit, nor should they pass it on to others who might use it in such a way.
- 4.5 Any particular information received by an employee from a councillor which is personal to the councillor and does not belong to the Council should not be divulged by the employee without the prior approval of that councillor, except where such disclosure is required or sanctioned by law.

5.0 Political Neutrality

- 5.1 Employees serve the Council as a whole. They must serve all councillors and not just those of a particular group and must ensure that the individual rights of all councillors are respected.

- 5.2 Employees may be required to advise political groups, but before providing such advice they should seek the approval of the relevant Strategic Director. In the provision of such advice employees should not compromise their political neutrality. Any advice given should be available to all political groups, if requested. An exception to this is the political supports officers who are specifically appointed to assist the political parties and are not required to share any advice given to any other political group.
- 5.3 Certain employees have roles which prevent them from undertaking certain political activities, such as canvassing for a political party or seeking election as a councillor (at a council other than Dacorum Borough Council) or other political office. These roles are commonly referred to as politically restricted posts. Please check your job description/employment contract to discover if you are in such a post.
- 5.4 All employees whether or not politically restricted must follow all lawful policies of the Council and must not let their own personal or political opinions interfere with their work.

6.0 Potential Conflict of Interest Situations

- 6.1 Employees are expected to conduct themselves with integrity, impartiality and honesty and their private interests should not be such as to have the potential for allegations of impropriety or partiality to be sustained thereby bringing the Council into disrepute.
- 6.2 In particular attention is drawn to the following examples of situations where potential conflicts of interest can occur.

6.2.1 Relationships with Councillors

Employees are responsible to the Council and for giving accurate and timely advice to councillors when required. Mutual respect between employees and councillors is therefore essential to good local government.

Close personal familiarity between employees and individual councillors can damage this relationship and prove embarrassing to other employees and councillors and should therefore be avoided.

Employees should deal with councillors in a polite, professional and efficient manner.

Whilst it is permitted for an employee to speak to their local ward councillor about any issue affecting them in their private capacity as a local resident, they should not approach nor attempt to influence councillors in relation to anything that relates to their position as an employee, or for their own, or a relative or friend's, personal gain/or detriment and should immediately report to an appropriate manager if a councillor attempts to pressurise them to deal with a matter outside of Council procedure or policy.

Further guidance on the conduct expected between officers and councillors is set out in the Protocol for Member/Officer Relations.

6.2.2 Contact with the Local Community and Service Users

The community and service users have a right to expect a high standard of service from the Council.

Employees have a responsibility to the community they serve and should ensure courteous, professional, effective and impartial service delivery to all groups and individuals within the community.

Employees should be positive, constructive and inclusive in their interactions with members of the community.

Where necessary, officers should make appropriate arrangements to communicate with people with disabilities in accordance with Council policies and should seek advice and guidance from the Council's Diversity and Community inclusion Officer where appropriate.

6.2.3 Relationships with Contractors, Planning Applicants and those applying for Council Grant

All relationships with external contractors, or potential contractors, or applicants for planning consents, grants or licences must be made known to the appropriate manager. This is particularly important if you are the employee who would normally deal with the matter in question. If that is the case you must declare your interest to your manager and the Council's Monitoring Officer and you must not have any involvement in making any decision relating to the matter.

Similarly, any beneficial interest or licence in respect of land which is affected by a planning application must be made known to the appropriate manager.

Orders and contracts, grants and planning decisions must be decided on merit and no special favour should be shown in the tendering process to any businesses, or potential suppliers, particularly those run by, for example, friends, persons to whom the employee owes (or is owed) an obligation, partners or persons where a family relationship is deemed to exist (see Appendix 1 for a definition of 'family relationship').

Employees who deal with, procure, engage or supervise contractors and consultants or process or determine applications under delegated powers with whom they have previously had, or currently have, a relationship in a private or domestic capacity, must declare that relationship to the appropriate manager and must not have any further dealings with the matter.

Employees must not accept money or any other reward from anyone who may benefit from work or funding provided by the Council. To do so would, in law, be corrupt.

7.0 Bribery, Corruption and Fraud

7.1 Under the Bribery Act 2010 it is a serious criminal offence to

- Offer, promise or give someone a reward to induce them to perform their functions or activities improperly.
- Accept, agree to accept or request a reward in return for performing a relevant function or activity improperly.
- Bribe a foreign public official in order to win business, keep business or gain business advantage for the organisation.

7.2 Use of Financial Resources

7.2.1 Employees 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 Council.

8. GIFTS AND HOSPITALITY

8.1 It would be inappropriate to foster an atmosphere in which Council employees refused all invitations for social involvement with persons or bodies who may have had, or may seek to have in the future, business dealings with the Council. Contacts established on a social basis can be helpful and in the Council's interests. At the same time it is very easy for such involvement to be misconstrued as providing an opportunity to bring about undue influence. All employees should seek the advice of their Strategic Director or the Monitoring Officer if in any doubt about the right course of action to pursue in such cases.

8.2 The general problem of gifts and hospitality is that very often a careful exercise of judgement may be necessary to decide how the public interest, and the Council's good name, may best be served. Some flexibility is necessary therefore, as extreme strictness can give unnecessary offence to people and organisations with whom the Council's relationships should be cordial. However, an appearance of improper influence is easily created, and with it encouragement of suspicion about the motives of those who serve in local government. The general rule must be "when in doubt, opt out".

8.3 The following guidelines are set out to help employees to avoid the risk of putting themselves in a position which could damage their own position and the public confidence in the Council and are intended to be of assistance to everyone in this delicate area:

8.4 Gifts:

The following paragraphs are particularly directed to gifts from organisations or persons who are, or who seek to provide work, goods or services to the Council, e.g. building contractors, suppliers of goods or equipment and firms

able to provide professional or commercial services to the Council. Apart from the items listed below, the employee must refuse any personal gifts offered to him or her or to a member of his or her family, by any persons or body who has or seeks dealings with the Council.

8.4.1 The following are acceptable:

8.4.1.1 A modest gift or gifts of a promotional character given to a wide range of people and not uniquely to you. These gifts are usually given at Christmas time and include calendars, diaries, desk sets, flow charts, and other articles of use in the office or job. In no circumstances should a promotional gift or gifts of this nature worth more than £25 (or £25 in total when the value of gifts from one source are aggregated together) be deemed acceptable.

8.4.1.2 Gifts on the conclusion of any courtesy visit to a factory or firm or other community or other organisation of a sort normally given by that firm or organisation

8.4.2 Obviously, it is wise to err on the side of caution as an obviously expensive gift could raise a question even if it otherwise falls within one of the above categories. If in doubt, you should seek the advice of your Strategic Director or the Monitoring Officer.

8.4.3 When a gift has to be refused, this should be done with tact, because the offering of gifts is common practice in the commercial world. In some cases a gift is simply delivered and there may be a problem of returning it, e.g. a turkey received at Christmas. However, unless they are listed in the acceptable items given above, the above guidelines should be followed. It is sometimes acceptable to the giver for the gift to be the subject of a raffle and the proceeds placed to a charitable fund. However, an arrangement of this sort should only be made with a Strategic Director or Monitoring Officer's approval and recorded in writing.

8.5 Hospitality:

Hospitality is sometimes offered to representatives of the Council and is accepted at official level, where it is reasonable in all the circumstances. Where it is offered to employees, special caution is needed where the host is seeking to do business with the Council or to obtain a decision on their services or supply of goods. It is important to avoid any suggestion of improper influence. The question is one of judgement, and the following examples are intended to give general guidance.

8.5.1 ACCEPTABLE

8.5.1.1 A functional working lunch or dinner provided at reasonable cost to allow the parties to discuss business.

Such lunches or dinners should not be held in extravagant or luxurious surroundings.

- 8.5.1.2 Invitation to a Society or Institute dinner or function.
- 8.5.1.3 Invitation to participate in Company sporting fixture or attendance as part of a group at an event.
- 8.5.1.4 Invitations to attend award ceremonies, opening ceremonies, celebrations of major commercial or community events.
- 8.5.1.5 Invitations to attend work or profession based conferences at nil or reduced cost.

8.5.2 UNACCEPTABLE

- 8.5.2.1 Holiday abroad or weekend in any holiday centre.
- 8.5.2.2 Offer of hotel and tickets for theatre.
- 8.5.2.3 Use of company flat or hotel suite.

8.5.3 In general terms it will often be more acceptable to join in hospitality offered to a group rather than to accept something unique to yourself. When a particular person or body has a matter currently in issue with the Council, e.g. litigation arising from a contract, then clearly common sense dictates that offers of hospitality be refused even if in normal times they would be in the acceptable list. Any offer of hospitality which does not readily come under the headings above, should be discussed with your Strategic Director or the Monitoring Officer before being accepted.

8.6 Registration of Gifts and Hospitality

Any offer of a gift or of hospitality, whether or not it is accepted must be declared to your manager. Any offer of a gift or hospitality worth more than £25.00 which is accepted must be recorded in a register maintained for the purpose by the Monitoring Officer using the form at Appendix 2.

8.7 Sponsorship - Giving and Receiving

8.7.1 Where an outside organisation wishes to sponsor or is seeking to sponsor a Council 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.

8.7.2 Where the Council wishes to sponsor an event or service neither an employee nor any friends, partners or persons where a family relationship is deemed to exist (see Appendix 1 for a definition of 'family relationship') must benefit from such sponsorship in a direct way without there being full disclosure to your Strategic Director and the Monitoring Officer of any such interest.

8.7.3 Similarly, where the Council through sponsorship, grant aid, financial or other means, gives support in the community, employees should ensure that impartial advice is given and that there is no conflict of interest involved.

9.0 Appointments and Other Employment Matters

9.1 Employees involved in appointments should at all times act in accordance with the Council's Recruitment and Selection Policy Statement.

9.2 The Recruitment and Selection Policy Statement part 3 states:

Applicants who are related to an employee of the Council must not be treated more favourably than any other applicant.

Employees must not be involved in the permanent, temporary or casual appointment of any of their relatives to a post in the Council. This includes shortlisting, interviewing, decision making and negotiating salary. Where a person applies for a vacancy in the same Service Group as one of their relatives, measures must be taken by the manager to exclude that relative from the entire recruitment process and to ensure that, if appointed, the new employee is not directly line managed by their relative.

9.3 Similarly, employees should not be involved in decisions in relation to discipline, performance, promotion or pay adjustments for any other employee who is a friend, a person to whom the employee owes (or is owed) an obligation, partner or person where a family relationship is deemed to exist (see Appendix 1 for a definition of 'family relationship').

9.4 Employees who are related to each other or have developed a personal relationship with any other member of staff, or Councillor within the Council, are required to declare this at the earliest opportunity to the Strategic Director, and Assistant Director, People.

10.0 Outside Commitments

10.1 An employee must not subordinate his/her duty to the Council to his/her private interests or put himself/herself in a position where duty and private interests conflict.

10.2 The Council will not attempt to preclude officers from undertaking additional employment outside their hours of duty with the Council, as long as any such employment does not, in the view of the Council, conflict with or react detrimentally to the Council's interests, or in any way weaken public confidence in the conduct of the Council's business.

Examples of unacceptable practices would include:

- architect, planner or other technical officer drawing plans for a third party for applications for planning consent by his/her own Council;
- any lawyer acting for client purchasing his/her house from the Council
- carpenter replacing door in a Council house in own time and at tenant's expense.

10.3 Therefore, where an officer wishes to engage in other business or take up additional appointment/s he/she must seek the permission of their Strategic Director and act at all times in accordance any contractual obligations in this respect.

10.4 Employees should follow the Council's rules on the ownership of intellectual property or copyright created during their employment.

10.5 Employees should be aware of their responsibilities under the Working Time Regulations.

11.0 Personal and Financial Interests

11.1 Employees must complete the Register of Interest Form at Appendix 3 within 28 days of the commencement of their employment and update the register within 28 days of becoming aware of any change to your interests.

11.2 Employees should review regularly their personal circumstances and take steps to deal with any potential conflict of interest.

11.3 In addition to completing the Register of Interest Form employees must declare to their Strategic Director any financial or non-financial interests that they consider could bring about conflict with the Council's interests, for instance:

- membership of an organisation receiving grant aid from the Council
- membership of an organisation or pressure group which may seek to influence the Council's policies
- membership of an organisation which may seek to influence the performance of an employee in carrying out their duties
- having a beneficial interest in land which is within the Council's district and is subject to any planning application.

11.4 Employees who have an interest, financial or non-financial, should not involve themselves in any decision or allocation of Council services or resources from which they, their friends, persons to whom they owe (or are owed) an obligation, or family might benefit and should ensure that the matter is referred immediately to their line manager.

11.5 The Council recognises and respects the right of all employees to become members of organisations. It only requires that employees declare personal and financial interests where there is, or could be perceived to be, a conflict of interest between their duties as an employee and their membership of the organisation.

12.0 Equality Issues

12.1 All members of the local community, customers and employees have a right to be treated with fairness and equality.

12.2 In this regard employees must:

- be made aware of their obligations under equality law (see Appendix 1, paragraph 4);
- co-operate with the Council in the application of any policies agreed by the Council relating to equality issues;
- not take discriminatory action or decisions or encourage or put pressure on fellow employees to take discriminatory action or decisions;
- report any concerns about discriminatory conduct to their line manager or other appropriate employee, such as Head of Service, Strategic Director or the Monitoring Officer.

13.0 Information Security

13.1 The Council maintains an Information Security Policy, in line with industry standards and recognised good practice, to support the confidentiality, integrity and availability of its information assets which are held electronically. As well as working to best practice standards, the Authority commits to deploying suitable hardware and software facilities to ensure that the data held by the Council is maintained in a secure environment. The Policy is also intended to ensure compliance with relevant legislation.

13.2 The purpose of the Policy is to ensure the effective maintenance and delivery of IT facilities, to protect the information that we hold and to meet relevant regulatory and legal obligations. It applies to all users of the Council's IT facilities and associated hardware/software and data processed by these systems.

13.3 Mobile telephone and smartphone usage

13.3.1 Mobile telephones may be used for private purposes during working hours, if kept on silent or vibrating alert. Such use must be reasonable and kept to a minimum e.g. in the case of an emergency, and should no way interfere with your work.

13.4 Social Media

- 13.4.1 The Council maintains a Corporate Information Technology Security Policy and Social Media Policy and employees shall act in accordance with those policies.
- 13.4.2 As an employee you should be aware that your personal use of social media – such as Facebook, Twitter, LinkedIn – should never breach any of our policies. For example employees should not use social media – either during or outside of working hours – in a manner that would breach:
- the Conduct policy
 - the Bullying and Harassment policy
 - the Corporate Information Technology Security Policy
 - any obligations you may have relating to confidentiality
 - criticise or offend the Council, its members, customers or other associates
- 13.4.3 Employees must ensure that they update any social media accounts with their latest employment details once they leave the Council.
- 13.4.4 Misuse of the Internet/Intranet/Social media may result in action under the any of the above policies, and could result in dismissal.

14.0 Criminal Offences

- 14.1 You must inform your line manager if you are being investigated, charged or have been convicted of any criminal offence during your employment. In the case of motoring offences these will be relevant if it is necessary to drive as part of your role. The line manager must inform HR immediately if they become aware that their employee is being investigated, charged or has been convicted of any criminal offence. Any breach of this requirement could result in summary dismissal for gross misconduct or other action under the Council's Disciplinary Policy.
- 14.2 It is your responsibility to immediately inform the Council if events occur which would change or add to the information included in a DBS or Disclosure Scotland check or to your original declaration under the Rehabilitation of Offenders Act 1974. Any breach of this requirement could result in action under the Council's Disciplinary Policy which could include dismissal. For further details please refer to the Council's Enhanced Vetting and Barring Policy on the intranet.

15.0 Whistleblowing

- 15.1 If an employee becomes aware of activities which he/she believes to be illegal, improper, unethical or otherwise inconsistent with this Code, the employee should report the matter, acting in accordance with the employee's rights under the Public Interest Disclosure Act 1998, through the Council's confidential reporting procedure, or any other procedure designed for this purpose. The Council's Whistleblowing Policy is available on Sharepoint [Anti Fraud - Policies - Whistleblowing Policy adopted 110707.doc \(sharepoint.com\)](#).

16.0 Breaches of the Code of Conduct

16.1 Any breach by an employee of any part of the Code of Conduct or its supporting policies and guidance may render the employee liable to disciplinary proceedings. It should be noted that a breach of the Code, and its supporting policies and guidance, will be subject to the provisions of the Council's disciplinary or other related procedures.

Appendix 1

LEGAL AND OTHER PROVISIONS RELATING TO THE CODE OF CONDUCT

1. Disclosure of Information (Section 4.0)

Data Protection Act 2018 and General Data Protection Regulation.

Freedom of Information Act 2000.

Local Government Act 1972 as amended (Access to meetings and documents.) Obligations of Discovery in connection with litigation.

2. Potential and/or Perceived Conflict of Interest Situations (Section 6.2.3)

Persons who owe you an obligation, or to whom you owe an obligation – this might include a debtor, creditor, fellow member of an organisation.

Very close personal relationships may also create a conflict, e.g. a good friend.

Family Relationship

Stage 2 - Composition of Panels paragraph entitled Canvassing on page D:50 of the Local Government Staff Commission's Code of Procedures on Recruitment and Selection (Code of Procedures) states that a relevant family relationship is deemed to exist between a Council officer and/or member and the person (i.e. the contractor, potential contractor, partner in a business etc.) if they are husband or wife, or partner (civil or otherwise), or if the person is the:

- parent
- son or daughter
- brother or sister
- uncle or aunt
- nephew or niece
- grandparent
- grandson or granddaughter
- foster child or foster parent
- dependent of the Council officer or member, or of the spouse or partner (whether civil or

3. Bribery

Bribery Act 2010, it is a criminal offence to request, agree, or accept a financial or other advantage intending that you will exercise your role as an officer improperly, or get another officer, or councillor to exercise their role or perform their duties improperly. It does not matter if you do not directly receive or accept the advantage.

4. Appointments and Other Employment Matters (Section 9.0) Section 7 Local Government and Housing Act 1989 Requires all officers to be appointed on merit

5. Equality Issues (Section 12.0)

Legislation

- Equalities Act 2010
- Human Rights Act 1998

KEY TERMS USED IN THE CODE OF CONDUCT

□ Employee/s or Member/s of Staff

The terms employee/s or member/s of staff should be taken to mean any individual/s employed by a council including those working both full time and part time on a permanent, temporary, fixed term or inward secondment basis. The Code also applies to seasonal and casual staff, agency workers and volunteers while they are engaged in carrying out duties for the council.

Appendix 2

Dacorum Borough Council's Code of Conduct for Employees

Notification by an Employee of Receipt of Gift or Hospitality over the value of £25.00

I, *(full name)*

an employee of Dacorum Borough Council

GIVE NOTICE that I have received the following [gift(s)] [hospitality] *(delete whichever does not apply)* over the value of £25.00

(a) Date(s) of receipt of [gift(s)] [hospitality]

(b) Name(s) and address(es) of donor(s)

(c) Nature of gift(s) and/or hospitality

Date

Signed

NOTE – This notification must be given by an employee to the Monitoring Officer upon receipt of any gift or hospitality over the value of £25.00.

Appendix 3

DACORUM BOROUGH COUNCIL

EMPLOYEE REGISTER OF INTERESTS

Name:

Job Title:

Service:

I have the following interests under the headings set out below which I am required to register under the Council's Employee Code of Conduct.

(please put "None" where you do not have an interest under a particular heading):

Financial Interests

1. Any land in the Borough of Dacorum in which you own, rent or occupy including your residential address.

(please provide a description sufficient to identify the location).

2. Any employment, office, trade, profession or vocation carried on by you for profit or gain outside of your contracted working hours at Dacorum Borough Council.

3. Any contract for goods, services or works which is made between you or a Relevant Person* and Dacorum Borough Council which has not been fully discharged.

(please give sufficient details to identify the contract)

4. The name of any body, or company, in which you have a beneficial interest in securities, (stocks, bonds, shares, exchange traded funds), which has a place of business or owns land in the Borough of Dacorum.

Other Personal Interests

1. Your membership of, or the fact that you are in a position of general control or management of, any body :-
 - (a) to which you have been appointed or nominated by Dacorum Borough Council;
 - (b) which is in receipt of grant aid from the Council
 - (c) which may seek to influence Council policies
 - (d) which may seek to influence the performance of an employee in carrying out their duties
 - (e) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)

2. Please state if you have a Relevant Person* relationship to any other employee, or Councillor, of the Council.

You must, within 28 days of becoming aware of any change to this Interest Form, update this form.

**Relevant Person in this Register of Interest Form means:
Either a person who is a family member defined as:*

- *husband or wife, or partner (civil or otherwise),*
- *parent*
- *son or daughter*
- *brother or sister*
- *uncle or aunt*
- *nephew or niece*
- *grandparent*
- *grandson or granddaughter*
- *foster child or foster parent*
- *dependent (whether civil or otherwise)*
- *Mother in law, father in law, brother in law, sister in law*

or any other person with whom you have a close personal or business relationship, e.g. close friend or business partner.