

# Officer Code of Conduct - Guidance

A guide to the responsibilities and standards  
expected of all Council employees

April 2021

[carmarthenshire.gov.wales](http://carmarthenshire.gov.wales)

Cyngor **Sir Gâr**  
**Carmarthenshire**  
County Council



## Table of Contents

<b>1.0</b>	<b>INTRODUCTION</b>	1
<b>2.0</b>	<b>OUR CORE VALUES</b>	1
<b>3.0</b>	<b>BREACH OF THIS CODE</b>	2
<b>4.0</b>	<b>STANDARDS REQUIRED</b>	2
<b>4.1</b>	<b>TREATMENT OF INFORMATION</b>	2
<b>4.2</b>	<b>INTELLECTUAL PROPERTY</b>	3
<b>4.3</b>	<b>POLITICAL NEUTRALITY</b>	3
<b>4.4</b>	<b>WORKING WITH ELECTED MEMBERS</b>	3
<b>4.5</b>	<b>POLITICALLY RESTRICTED POSTS</b>	4
<b>4.6</b>	<b>PERSONAL CONDUCT</b>	4
<b>4.7</b>	<b>SECONDARY EMPLOYMENT</b>	5
<b>4.8</b>	<b>DECLARING AN INTEREST</b>	6
<b>4.9</b>	<b>DIVERSITY AND EQUALITY</b>	7
<b>4.10</b>	<b>AWARDING AND MANAGING CONTRACTS</b>	8
<b>4.11</b>	<b>CORRUPTION</b>	8
<b>4.12</b>	<b>PROPER USE OF COUNCIL RESOURCES</b>	8
<b>4.13</b>	<b>HANDLING COUNCIL MONEY OR SPONSORSHIP</b>	9
<b>4.14</b>	<b>GIFTS AND HOSPITALITY</b>	10
<b>4.15</b>	<b>GIFTS</b>	11
<b>4.16</b>	<b>HOSPITALITY</b>	11
<b>4.17</b>	<b>AUTHORISATION PROCESS FOR ACCEPTING GIFTS AND HOSPITALITY</b>	12
<b>4.18</b>	<b>MEMBERSHIP OF OTHER ORGANISATIONS</b>	12
<b>4.19</b>	<b>COMMITMENT TO THE ENVIRONMENT</b>	13
<b>4.20</b>	<b>MANAGING OTHERS</b>	13
<b>4.21</b>	<b>IMPROPER OR ILLEGAL ACTIVITIES</b>	14
<b>4.22</b>	<b>LEAVING THE COUNCIL</b>	14
<b>5.0</b>	<b>APPENDICES</b>	16
<b>5.1</b>	<b>APPENDIX A: THE SEVEN PRINCIPLES OF PUBLIC LIFE</b>	16
<b>5.2</b>	<b>APPENDIX B: THE WELLBEING OF FUTURE GENERATIONS ACT (WALES) 2015</b>	18
<b>5.3</b>	<b>APPENDIX C: FREQUENTLY ASKED QUESTIONS</b>	20

---

## 1.0 Introduction

The public is entitled to expect the highest standards of conduct from all Council officers. Your role is to serve the Council in delivering services to the local community, providing advice, and implementing its policies. In performing your duties, you must act in an open manner with integrity, honesty, impartiality, and objectivity.

The [Council's Officer's Code of Conduct](#), contained within Part 5.4 of our Constitution, defines the responsibilities and standards required of all who work for and on behalf of Carmarthenshire County Council (the Council).

This guidance has been produced to provide clarity in relation to our responsibilities as Council employees and applies to all Council employees including temporary, casual, agency workers and Council employees who are seconded to and from other organisations.

## 2.0 Our Core Values

The Council is committed to living out its values. Working together as **One Team** we will:

- Focus on our customers
- Listen to improve
- Strive for excellence
- Act with integrity
- Take personal responsibility



---

### **3.0 Breach of this Code**

Breaches of this code (inside or outside of work) will be investigated and may result in disciplinary action. Serious breaches of the code may be considered gross misconduct and result in dismissal without notice.

You must participate in any investigations, including those carried out by the Monitoring Officer, who is responsible for reporting any actual or potential breaches of the law or mal-administration to Council and / or Executive Board.

#### **When working on behalf of the Council you must:**

- ✓ Act in the interests of the Council and in accordance with the principles of public life of selflessness, integrity, objectivity, accountability, openness, honesty, and leadership.
- ✓ Comply with the Council's constitution, service requirements, policies and standards, legislation and other professional standards that apply to your role.
- ✓ Declare to your line manager any potential or actual conflicts of interest or relationships that may impact on your work, or that of the Council
- ✓ Report any concerns or breaches of this code to your manager.
- ✓ Ask your manager if you are unsure what is required of you.

### **4.0 Standards Required**

#### **4.1 Treatment of Information**

Maintaining confidentiality of sensitive information is essential.

#### **You must:**

- ✓ Comply with our policies in relation to information governance ensuring the protection of all data.
- ✓ Report any suspected breaches of information security.

- 
- ✓ Label and store information documents to allow access to authorised users and restrict unauthorised users.
  - ✓ Refer any media or press enquiries to the Marketing and Media Team immediately.
  - ✓ Practice good password management and be aware of phishing emails.

**You must not:**

- ✗ Compromise the security of Council information by sending personal, sensitive or confidential information externally over standard e-mail.
- ✗ Disclose your password(s) to anyone.
- ✗ Leave your devices unattended.
- ✗ Use information or facilities provided by the Council for unauthorised personal use, improper or commercial gain, or for fraudulent or malicious activities.

## 4.2 Intellectual Property

The work you do on behalf of the Council is called intellectual property.

- ✓ **You must** seek the permission of your line manager or Head of Service before you disclose any design or invention created during your work

## 4.3 Political Neutrality

When working on behalf of the Council:

- ✓ **You must** remain politically neutral and objective in your work role.
- ✗ **You must not** allow your own personal or political opinions to interfere with your work

## 4.4 Working with Elected Members

Mutual respect between those working on behalf of the Council and Elected Members is essential to good local government.

**You must:**

---

- 
- ✓ Work for all Members providing appropriate and impartial advice always.
  - ✓ Ensure working relationships are kept on a professional basis.

#### 4.5 Politically Restricted Posts

Legislation sets out certain local authority posts that are politically restricted. If you hold such a post:

- ✓ **You must** remain politically neutral in your work role.

**You must not:**

- ✗ Stand as a candidate for public elected officer (other than to a Town and Community Council).
- ✗ Hold office in a political party.
- ✗ Canvass at elections.
- ✗ Speak or write publicly, demonstrating support for a political party.

#### 4.6 Personal Conduct

As a representative of the Council, you are expected to conduct yourself to the highest standards. Our [Behavioural Standards in the Workplace Guidance](#) set out what is expected of employees in terms of acceptable behaviour.

**You must:**

- ✓ Carry out the full requirements of your role aligned to your contract of employment and Council policies.
- ✓ Behave politely and reasonably.
- ✓ Maintain acceptable standards of appearance and personal hygiene.
- ✓ Demonstrate your commitment to valuing diversity and equality.
- ✓ Attend work in accordance with the terms of your contract of employment and comply with sickness and other absence policies.
- ✓ Wear your ID card whilst representing Council.

- 
- ✓ Report any shortfall in the provision of Council services to your line manager.
  - ✓ Keep relationships with Elected Members, officers, contractors or partners, potential contractors, or service users, on a professional basis. If you have a personal relationship with any of these groups of individuals, you must declare this using our on-line Declaration of Interest form, which can be found on [your MyView Account](#).
  - ✓ Avoid damage to Council's reputation or services.
  - ✓ Register any financial and non-financial interests with your line manager using our on-line Declaration of Interest form.

**You must not:**

- ✗ Engage in any conduct that is harmful to Council or its interests, or which brings legal action against Council.
- ✗ Be under the influence of alcohol or unprescribed drugs. Our [Alcohol and Substance Misuse Policy](#) provides further information.
- ✗ Misuse your official position or information obtained in the course of your work, for personal interest or the interest of others.

#### **4.7 Secondary Employment**

Secondary employment means any paid or unpaid work, including voluntary work, undertaken in addition to your work at the Council.

**You must:**

- ✗ Discuss any proposed paid or unpaid work with your line manager before accepting and record such work using our on-line Declaration of Interest form.
  - ✗ Ensure the work does not conflict with your role and interests of the Council.
  - ✗ Comply with Working Time Regulations, which govern the total number of hours you can safely work.
-

---

**You must not:**

- ✘ Carry out your secondary employment during Council time.
- ✘ Use Council resources or information to undertake your secondary employment.

#### **4.8 Declaring an Interest**

**You must** declare to your line manager, using our on-line **Declarations of Interest** process, any financial and non-financial interests that you consider could bring about conflict with the authority's interests.

If anyone could assume that you were doing anything in your role as a Council employee that would benefit yourself or anyone you know in a personal capacity, then you need to be up front about it and record it. If in doubt, ask your manager for advice.

Your line manager in counter signing the declaration is confirming that they are aware of the potential conflict of interest as declared by you and that one of the following applies:

a) The line manager does not consider that the interest has a material effect in relation to your work as an employee with the Council (i.e., it is personal but not prejudicial).

**OR**

b) The line manager will work with you to ensure that an actual conflict of interest will not arise (this may involve re-distributing work when necessary to avoid an interest becoming prejudicial)

If your line manager cannot identify an obvious way to avoid you having a conflict of interest, then this situation must be reported to the Monitoring Officer for advice.



▶

---

In extreme circumstances, the Council may potentially require employees to relinquish certain responsibilities or interests to remain in the employ of the Council. The Monitoring Officer will keep a record of the advice provided and any decisions taken in this regard.

It is your responsibility to declare any interests in advance where you know of them and as new interests arise, to declare them as soon as possible when you become aware of a potential conflict.

To assist, you will receive an annual reminder. In addition, as part of your appraisal / supervision meetings, your manager should remind you of the need to declare potential conflicts of interest or, if you have made previous declarations, remind you of the need to review and update them. Updated declarations should be submitted via our on-line Declarations of Interest process.

**Remember – it is your responsibility to make declarations not your line manager's.**

#### **4.9 Diversity and Equality**

Everyone has a responsibility to embrace and support equality and diversity and to challenge behaviour and attitudes that prevent us from achieving this.

We are all personally responsible for ensuring that we support positively the principles of equality and diversity at all times, co-operate by promoting good relations and challenge inappropriate behaviour by following the values set out in our Equality and Diversity Policy and other associated policies and guidance.

**You must:**

- ✓ Treat others fairly and with respect at all stages of employment including the recruitment process.

- 
- ✓ Ensure others are free from harassment, discrimination or victimisation of any description, and create an environment where everyone has the right to challenge inappropriate behaviour in a safe environment.

**You must not:**

- ✗ Discriminate unfairly in employment practices, the provision of facilities or services.

#### **4.10 Awarding and Managing Contracts**

Where your role involves procuring, managing or using Council contracts:

- ✓ **You must** comply with the procurement rules and financial regulations on the award of orders and contracts.
- ✗ **You must not** discriminate against any part of the local community in the tendering and contracting process.

#### **4.11 Corruption**

**You must not:**

- ✗ 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 in your official capacity. **This is a serious criminal offence.**

In addition, Section 2 of the **Prevention of Corruption Act 1916** states that where it is proved that anyone holding or seeking a contract with a public body has made a payment to an employee of that body, the payment shall be deemed to be corrupt unless the contrary is proved.

Allegations of this nature will be investigated/dealt with in accordance with the Council's disciplinary procedure.

#### **4.12 Proper Use of Council Resources**

The Council is responsible for efficient use of the public resources it controls including financial resources, equipment, and its staff.

---



---

**You must:**

- ✓ Operate within the required accounting standards.
- ✓ Comply with health and safety regulations and use personal protective equipment as required.
- ✓ Take care of Council property or equipment, keeping it secure and reporting any breakages or breaches of security.
- ✓ Use equipment and facilities for authorised purposes only.
- ✓ Ensure that the Council's auditor and external auditors are given access at all reasonable times to premises, personnel, documents, and assets that the auditors consider necessary for the purpose of their work.
- ✓ Provide the auditors with any information and explanations that they seek in the course of their work.

**You must not:**

- ✗ Use Council premises, property, vehicles, or other Council facilities unless authorised to do so.
- ✗ Do work that is not Council work in Council premises or by using Council equipment or materials, or during the Council's time.

#### **4.13 Handling Council Money or Sponsorship**

The Council is a publicly funded organisation and as such you must be familiar with the Council's Financial Regulations.

**You must:**

- ✓ Use Council funds in a responsible, accountable, and lawful way.
- ✓ Comply with the Council's financial regulations and take legal and financial advice where appropriate.
- ✓ Seek value for money. Our Corporate Procurement team can offer further advice.

- 
- ✓ Comply with the policy issued by your Department if your role involves the handling of customer finances.
  - ✓ Make sure that any sponsorship accepted is related to Council business.
  - ✓ If you suspect any financial irregularity, corruption, or fraud, contact the Head of Revenues and Financial Compliance.
  - ✓ Make sure you do not benefit from any contract or sponsorship the Council may receive, or show any favour to a partner, spouse, relative, friend or associate.

#### **4.14 Gifts and Hospitality**

Section 117 of the Local Government Act 1972 requires that “an officer of a local authority shall not, under colour of his/her office or employment, **accept any fee or reward whatsoever other than his/her proper remuneration**”.

An officer who contravenes the provisions of Section 117 will be liable on summary conviction to a fine not exceeding £2,500.

**You must not:**

- ✗ Accept personal gifts, loans, fees, rewards or advantage from service users, contractors, potential contractors including those who have previously worked for Council, or outside suppliers, regardless of the value.
- ✗ Accept inducements e.g., a bribe. All offers of inducement must immediately be reported to the appropriate senior manager and be registered as set out in this guidance note.

**You must:**

- ✓ Respectfully decline any offer of a gift or hospitality, explaining the Council’s position.
- ✓ Respectfully decline any offer of hospitality where it might be seen by the public to compromise your integrity e.g., complimentary tickets to sporting events etc.

- 
- ▶
- ✓ Declare any offer of a gift or hospitality using our on-line Declaration of Gifts and Hospitality process, regardless of the value.

If declining the offer of a gift is likely to cause offence due to cultural or religious beliefs, consider donating the gift to a local charity.

#### **4.15 Gifts**

We understand that, from time to time, you will be offered complimentary low value promotional materials whilst discharging your duties.

In cases such as these it is permissible for you to accept such low value items providing the gift is to be used for work purposes and is preferably marked with the donor's branding or company name.

Examples may include items such as diaries, calendars, pens, mouse mats or any other low value stationery item. These types of items **do not** need to be declared.

#### **4.16 Hospitality**

We understand that, from time to time, you will be offered hospitality whilst attending conferences, seminars, training events, courses, meetings with partnership organisations etc.

In cases such as these, it is permissible to accept the hospitality where it is clear the hospitality is corporate rather than personal, and where the Council is satisfied that any purchasing decisions are not compromised.

Where visits to inspect equipment etc. are required, you should ensure the Council meets the cost of such visits to avoid jeopardising the integrity of subsequent purchasing decisions.

Where attendance at such events is considered appropriate, attendance should be **authorised in advance** by your Director or Head of Service. When deciding the

▶

---

appropriateness of accepting such hospitality, consideration will be given in all cases to the benefits to the Council.

When receiving authorised hospitality, employees should be particularly sensitive as to its timing in relation to decisions which the Council may be taking affecting those providing the hospitality.

If you attend events with Elected Members, other council employees or guests, you are not permitted to reclaim expenses relating to the provision of hospitality at that event such as drinks, etc.

If an employee's interpretations of this Code and/or their actions are called into question, it is the responsibility of the appropriate manager to investigate whether the person acted in good faith according to their understanding of the Code of Conduct.

#### **4.17 Authorisation Process for Accepting Gifts and Hospitality**

Where acceptance of gifts and hospitality are deemed appropriate authorisation from the relevant Director or Head of Service will be required. It is suggested that this authorisation is captured electronically via e-mail.

If the offer is made to a Head of Service, the appropriate Corporate Director will provide the authorisation.

If the offer is made to the Corporate Director, the Chief Executive will provide the authorisation.

If the offer is made to the Chief Executive, the Monitoring Officer will provide the authorisation.

#### **4.18 Membership of Other Organisations**

- 
- ✓ **You must** declare to your Head of Service or line manager membership of any organisation not open to the public without formal membership and commitment of allegiance and which has secrecy about its rules, membership, or conduct.

#### **4.19 Commitment to the Environment**

In demonstrating your commitment to the environment:

**You must:**

- ✓ Consider the environmental impact of your actions and decisions.
- ✓ Reduce, re-use and recycle wherever possible.
- ✓ Develop environmentally sensitive policies and practices with suppliers, partners, and customers.

#### **4.20 Managing Others**

As a manager, your leadership skills are key elements of your role.

**You must:**

- ✗ Maintain an environment of respect, recognition, and support and to induct all new employees to their role.
- ✗ Make appointments only based on merit and capability to carry out the role.
- ✗ Make sure decisions relating to discipline, promotion and pay are objectively justified.
- ✗ Identify and assess all risks and ensure they are managed appropriately.
- ✗ Ensure business continuity arrangements are in place to enable continued delivery of services.
- ✗ Exercise a duty of care to employees and customers, ensuring health and safety requirements are met.

**You must not:**

---

- 
- ✘ Be involved in a selection process or interview if you are related to an applicant or in a personal relationship with them or a member of their immediate family.

#### **4.21 Improper or Illegal Activities**

If you are concerned about any activities, which you think may conflict with the Code of Conduct, you should raise the matter with your line manager or Head of Service.

**You must** report any activity, which you believe is illegal, improper, unethical, dangerous or a breach of policy to your line manager or Head of Service.

The Whistleblowing Policy gives protection to employees, consultants or contractors who raise concerns of this nature that are in the public interest.

#### **4.22 Leaving the Council**

After leaving the Council:

- ✓ **You must** return all property, information and materials acquired during your employment including your ID card and all IT equipment.
- ✘ **You must not** disclose any personal data relating to others or exempt / confidential information that you have acquired in the course of our work at the Council.



▶

---

For further information you can contact us in the following ways:

By email:

[HR@carmarthenshire.gov.uk](mailto:HR@carmarthenshire.gov.uk)

By telephone:

[01267 246129](tel:01267246129)

By visiting our intranet pages:

<https://ourpeople.carmarthenshire.gov.wales/our-people/democracy/>

<http://ourpeople.carmarthenshire.gov.wales/our-people/working-for-us/>

<http://ourpeople.carmarthenshire.gov.wales/our-people/hr/>

<http://ourpeople.carmarthenshire.gov.wales/our-people/health-safety/>

<http://ourpeople.carmarthenshire.gov.wales/our-people/it-support/it-security/>

<http://ourpeople.carmarthenshire.gov.wales/our-people/information-governance/>



---

## **5.0 Appendices**

### **5.1 Appendix A: The seven principles of public life**

Set out below are the seven general principles of conduct that underpin public life (the Nolan Principles). We need to take account of these, and they are reflected within the requirements of this code of conduct document.

#### **Selflessness**

Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

#### **Integrity**

Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to 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**

Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

#### **Openness**

Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

#### **Honesty**

Holders of public office 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**

Holders of public office should promote and support these principles by leadership and example.

## 5.2 Appendix B: The Wellbeing of Future Generations Act (Wales) 2015

The Future Generations Act sets out five ways of working needed for public organisations to achieve the seven wellbeing goals. They provide an opportunity for innovative thinking, reflecting the way we live our lives and what we expect of our public services:

<b>Public service values – the beliefs we hold</b>	<b>Wellbeing delivery principles – how we will work</b>
Working for the long term: To protect the ability of future generations to meet their own needs involves real long-term integration and collaboration which looks at the wellbeing of people and communities, economic prosperity and the health of the natural environment.	Long term: The importance of balancing short-term needs with the need to protect our ability to meet long-term needs.
Always growing and improving: We will be positive and at our best for the people of Wales and each other by choosing positive attitudes and behaviours, embracing learning and development and sharing ideas on ways to improve and deliver public services.	Prevention: How acting to prevent problems happening or getting worse may help public organisations meet their aims.
Working together: Where everyone is involved in delivering public services and they value others' contributions, share common principles and collaborate for the benefit of the people of Wales, within and	Integration: Considering how the public organisation's wellbeing aims may affect each of the wellbeing goals, or their other aims, or on the aims of other public organisations.



---

across organisational boundaries and sectors.	
Treating everyone with respect: Recognising, valuing and respecting the diversity of the people of Wales is central to seeing people as individuals and doing the right thing, at the right time and in the right place for each other.	Collaboration: Acting in collaboration with any other person (or different parts of the organisation) that could help them meet their wellbeing aims.
Putting people first: Our organisation needs to be focused on the needs of the people of Wales. This means we need to genuinely involve people in decision-making which affects them and their communities.	Involvement: The importance of involving people with an interest in achieving the wellbeing goals, and making sure that those people reflect the diversity of the area which the organisation serves.



---

## 5.3 Appendix C: Frequently Asked Questions

### 1. What is meant by using Council resources for own purpose?

**You must not** use Council resources for your own purpose. Examples of this include using:

- Council letter heads or postage for personal letters.
- Council IT equipment to undertake non-Council related work.
- Council vehicles for personal trips.
- Using the Council's telephony system to make non work-related calls without permission.
- Operate a business during Council time.
- Promote products or facilities in Council time in order to make personal gain.

### 2. What could constitute an act of bribery?

An offence would be committed if for example:

- An officer requesting, agreeing to receive, or accepting an advantage in return for services.
  - An advantage being secured with the "consent or connivance" of the manager.
  - Officers agreeing to "fix" a procurement process or evaluation in the briefer's favour.
- A "financial" or "other advantage" may include money, assets, gifts, hospitality, or services.

### 3. A company doing business with the Council has offered me and my partner free rugby tickets, can I accept?

**You must not** accept any offers to attend purely social, cultural, or sporting events should be respectfully refused unless you are attending as the Council's representative.

▶

---

**You must** also declare the offer using our on-line Declarations of Gifts and Hospitality process even though it has been declined.

If there is any suggestion of influence or reward it should not be accepted under any circumstances irrespective of the value.

Every time a Council officer accepts a gift or hospitality from someone who does business with the Council an ethical problem and even possibly a criminal offence may occur.

It does not matter whether the gift is in the form of money, a discount not offered to all other officers, alcohol, dinner at a local restaurant, a trip, or anything else.

#### **4. I have been offered some free pens and stationery by a supplier; can I accept them?**

We understand that, from time to time, you will be offered complimentary low value promotional materials whilst discharging your duties.

In cases such as these it is permissible for you to accept such low value items providing the gift is to be used for work purposes and is preferably marked with the donor's branding or company name.

Examples may include items such as pens, diaries, calendars, mouse mats or any other low value stationery item. These types of items do not need to be declared

#### **5. What is the definition of a Close Association?**

When considering whether to declare a close personal association you should consider whether there could be any perceived influence or bias. Close personal associations/relationships within this guidance are defined as employees who are:

---

- 
- Married, Civil partners, in a partnership or co-habiting arrangement.
  - Immediate family members of the applicant or employee e.g. parents, son/daughter, brother/sister, grandparent/grandchild.
  - Other relations of the applicant or employee e.g. extended family such as Aunts, Uncles, Cousins, Nieces, Nephews or any other individuals with whom there is a close personal association e.g. close friendships or relationships, business associates (outside the authority).
  - It also includes a previous association e.g. former spouse, where there could be a degree of bias.
  - A child/young person or vulnerable adult/ client whom an employee meets as a result of their employment.
  - A person with whom you are/have been in conflict or dispute.

If you are uncertain about whether an association should or should not be declared, then you should err on the side of caution and declare it. The key test is whether such an association could be seen to affect an individual's personal judgement.

**6. A close family member has a grounds maintenance business and there is a Council grounds maintenance contract being tendered in which he wants to bid. How does that affect my employment with the Council?**

**You must** notify your line manager immediately as you may have a conflict of interest. This information needs to be declared using our on-line Declarations of Interest form. If you are employed in procuring those services, then you cannot be involved in the contracting process in respect of that contract.

**You must not** use any information you have to inform your husband's tender submission.



▶

---

The Council must act and be seen to act without bias. In certain cases, depending on your job and the circumstance, the Council would need to review whether you could continue to be employed by the Council.

**7. My daughter is also an employee of the Council, what should I do?**

**You must** notify your line manager and declare this information using our on-line Declaration of Interest process. Our Close Personal Associations and Relationships guidance will provide further information.

**8. I am a member of the Freemasons, do I need to declare it?**

Not routinely, however as circumstances arise you should consider whether your membership gives rise to a conflict of interest and whether you should declare it at that point in time.

**9. I have interests in a number of local companies, what is the position with these?**

**You must** declare and register any shareholdings in each company. If you are employed by any of the companies (paid or unpaid) then you will need to consult with your line manager in relation to secondary employment. If you have an association with the company, you must declare it using our on-line Declarations of Interest process.

**You must not** use any information or resources you have via your Council role to advantage the companies.

**10. Are there any other examples of a conflict of interest?**

- Membership of a Carmarthenshire School Governing Body.
- Your membership, or position of control or management, in bodies exercising functions of a public nature (that is, carrying out a public service, taking the place of a local or central governmental body in providing a service, exercising a function

▶

---

delegated by a local authority or exercising a function under legislation or a statutory power).

- Any contracts between the authority and any company/body you have an interest in.
- Any political appointment.
- Employment of an employee's direct family (wife, husband, partner, son, daughter, brother, sister, mother or father) by the Council.
- Businesses that employ an employee's direct family (wife, husband, partner, son, daughter, brother, sister, mother or father) where the employee has any ability to affect or potentially affect the Council's decisions to use that company's services.
- Involvement with an organisation receiving grant aid from the Council.
- Any land or property in the authority's area in which you have a beneficial interest.
- Membership of any organisation not open to the public without formal membership and commitment to allegiance and which has secrecy about rules and membership or conduct.

There may be other situations that could give rise to a conflict of interests which should also be declared. **The key is that good judgement should be exercised and if in doubt seek advice.**

### **11. Will my declared interest be released to members of the Public or the Media through FOIA requests?**

With the specific exception of Chief Officers, information gathered through this process is for use by the Council only and as such will not be made public, unless there is an overriding legal requirement for disclosure.

For example, as a statutory disclosure in the annual Statement of Accounts or where a request is made under the Freedom of Information Act and no exemption applies.

Information disclosed as a result will be kept anonymous and staff involved will be informed.

## **12. Who can access my declaration(s)?**

Staff declarations will be held securely only to be accessed by the Director and his/her delegated officer. However, during the course of collection, or of reasonable management and assurance procedures, information may be made available to the employee's line manager, audit and HR.

All employees are encouraged to discuss conflicts of interest with their line manager and to jointly identify interests that should be declared.

## **13. Where can I get advice about what needs to be declared?**

If you require advice on whether something should be declared, then speak to your line manager in the first instance. If you are still not clear speak to colleagues in People Management or Administration & Law.

## **14. Can I join a protest march against government policy?**

The Council supports all citizens' rights to free speech at all times but you must not behave in a way that could bring the Council into disrepute or harm its reputation. For example, you should not carry an abusive placard or give an inflammatory speech expressing views that conflict with or damage the Council's reputation.

## **15. I am suspicious that one of the clients where I work is being abused, what should I do?**

▶

---

You will need to report your concerns. Please refer to our Whistleblowing and Grievance policies, which set out the procedure that should be followed. You may wish to raise your concerns with your line manager in the first instance.

**16.I have received a request from a member of the public for personal information to be released. What is my first step?**

You should talk to the Information & Data Protection Officer before releasing any information.

**17.My employment with the Council has come to an end, are there any restrictions on the type of work I can do for other organisations?**

This depends on the nature of your role within the Council prior to you leaving. Provisions of the Code of Conduct may still apply after your employment terminates with the Council. For Chief Officers there are specific restrictions that are applicable and are defined by the nationally agreed terms and conditions for JNC employees. Refer to your Terms and Conditions of Employment or seek advice from People Management Division.

**18.I have reason to believe that someone else is acting in a way that breaches this Code, what should I do?**

You will need to report it. Please refer to our Whistleblowing and Grievance policies, which set out the procedure that should be followed. You may wish to raise your concerns with your line manager in the first instance.

**19.What happens if I don't act within the Code?**



---

Breaches of this code (inside or outside of work) will be investigated and may result in disciplinary action. Serious breaches of the code may be considered gross misconduct and result in dismissal without notice.