

Register of Interests - Frequently Asked Questions

1. I don't have anything to record – do I still need to do the exercise?

Yes.

2. How do I make my declaration?

You should make your declaration via the link on the Your HR Employee Self-Service homepage.

If you do not have access to Your HR then you will have to speak to your manager and make your declaration for him or her to record on the editable declaration form available from <https://warwickshiregovuk.sharepoint.com/SitePages/HR/Conduct.aspx> under the Register of Interests section. Your manager will have to read you all of the information on the declaration form in order to record your answers. Once approved by your manager, the completed return should then be emailed by your manager to the HR Service Centre so that there is a centrally held record of such returns (the HR Service Centre via [HR Service Desk](#)).

3. The information you record must be accurate as at 31 March 2021

If, having made the return, your circumstances change you will need to complete a new return without delay to show your current position by following the procedure set out in 2 above.

4. What is a significant shareholding?

CIPFA SORP suggests that a significant interest is one where the member of staff, his immediate family and members of the same household in total have more than a 20% shareholding in a company. However, it may be that a shareholding below this is 'significant' for e.g. where the individual has veto rights, exercises control/ influence over the company in other ways. It is a matter for each employee to use his/her discretion to answer this on the particular circumstances

5. Do staff who work in WCC offices but who are not employees have to complete a return (i.e. consultants, secondments etc)?

These staff should be asked to complete a return. If they spend time on WCC premises and are involved in WCC work, there could be a situation where a conflict arises regardless of their status where their outside interests bring them into conflict with the work / interests of WCC and it is legitimate for WCC to want to know about that

6. Do all staff have to complete a return, regardless of their grade?

Yes – it also applies to temporary as well as permanent staff if they have or will work for WCC for longer than 3 months.

7. Do volunteers have to complete a return?

As they are not WCC employees or contractors we cannot compel them to complete a return. However, they are under our direction and control and there could be a scenario where a volunteer has an outside interest which conflicts with the County Council's interests. All volunteers should therefore be asked and encouraged to complete a return. When they leave however, as part of our review the information we hold on them, we should consider whether it is appropriate to destroy their returns.

8. Do staff at Pupil Reintegration Units need to complete returns?

Yes.

9. Should the hard copy returns be signed?

Yes.

10. Are staff required to declare personal life choices (e.g. religious beliefs)?

No – the whole point about the return is for staff to register personal interests, which might bring them into conflict with their professional life and the work of the County Council. Membership of community and voluntary organisations, which have no bearing on the County Council and don't raise any issue of conflict do not need to be registered. This will be a matter of judgement for each individual.

11. Is the collation of this information covered by WCC's Data Protection Act registration?

Yes – the category of 'Staff Administration' would cover collation of this information under the Data Protection Act. This covers permanent and temporary staff

12. What does letting contracts mean?

This question is asking whether you are involved in the contract process through which the Council buys goods, services or works. In other words, are you involved in deciding whether we need the goods, when to go out to tender, setting the contract requirements, evaluating tenders received and selecting the preferred supplier?

13. Do I hold a politically restricted post?

You hold a politically restricted post if you satisfy any of the two categories below

- (i) you are a Strategic Director or Head of Service (i.e. you report directly to a Strategic Director); or
- (ii) you undertake work of a politically sensitive nature (i.e. you give advice on a regular basis to members or speak on behalf of the Council on a regular basis to journalists/broadcasters).

14. I hold a politically restricted post, do I need to register membership of a political party / interest group?

Staff who are members of a political party do not, as a matter of course, have to register that interest on the return. However, they should still consider if they think, bearing in mind the job that they do (their position in the organisation, the extent of their work with members, their influence over policy direction etc), that there is a conflict or people could perceive there to be a conflict with the Council's interests. If they think there is, then the interest should be recorded. The principle is the same for membership of a pressure group. To a large extent this will depend on what the group is and how this relates to the Council's position.

Staff who are members of political parties and who hold politically restricted posts should of course be aware of the legal restrictions placed on them. Whilst they can be a member of a political party, the statutory framework prohibits them from doing the following things

- standing for election as MP, MEP, councillor
- acting as an election agent / sub-agent
- acting as an officer of a political party or sitting on a committee of a party which amounts to participating in the general management of the party or acting on its behalf
- canvassing on behalf of a party or person standing for election
- speaking to the public with the intention of affecting public support for a party (e.g. promoting it)

- speaking publicly, publishing articles, papers etc which are intended to affect public support for a party
- 15. I've read the above guidance but my query is not dealt with. What should I do?**
If the above guidance doesn't cover your query and you are in doubt as to whether to declare something as an "interest" we advise that you do declare it.

Specific Guidance for Managers where a return is made through Your HR

- 16. When a return from a member of my team made through Your HR is sent to me for "approval" or "rejection" what am I being asked to do and why?**

A register of interests declaration cannot be submitted to the Your HR system without a member of staff's line manager having confirmed that he or she has considered the return made and has "approved" it (the alternative action is for the line manager to "reject" it).

By clicking "approve" line managers are acknowledging that they have read and understood the return that a member of their team has made and are happy with it. Line managers will then be in a better position to manage those interests in practice (it is for line managers to ensure that any genuine conflicts of interests registered by a member of their team do not lead to that team member working in an area where his or her conflict manifests – speak to your own line manager for guidance on this if unsure.)

In addition, this check by managers will also serve as a quality control exercise in that incomplete returns will not be approved by managers and will have to be re-submitted.

A line manager would also "reject" a return if he or she was fundamentally unhappy with it and considered that the issue could not be managed in practice.

- 17. I want to delegate the work referred to in 16 above to a proxy. Is this possible?**
There is no delegated access.

Specific Guidance for Managers who have staff that are not on Your HR

- 18.** If any staff who you line manage do not have Your HR access, then please ask them to declare any interests that they (or a close family member) may have that could conflict with the Council's interests. As we are currently working from home we have created the following system for these staff which bypasses having to deal with hard copy forms. Instead, managers should download a copy of the editable declaration form (from <https://warwickshiregovuk.sharepoint.com/SitePages/HR/Conduct/Register-of-Interests.aspx>) and complete it on behalf of their staff (managers will have to read out all the information on the form to the relevant member of staff so that he or she can give their answers). Managers should then approve or reject the same and then email the completed form to the HR Service Centre, so that there is a centrally held record (the HR Service Centre via [HR Service Desk](#)).