

Staff Register of Interests – Guidance for Managers

- It is the **responsibility of all staff** to complete each year an annual register of interests return (updated during the year if their interests change). We have prepared a separate FAQs document which gives staff relevant guidance about what should be disclosed.
- The purpose of this note is to help managers to whom these returns will be submitted.
- It is the **responsibility of line managers** to review each of their team member's staff register of interests submission made via Your HR. These returns cannot be submitted to Your HR without the line manager having confirmed that he or she has considered the return made and pressing the "approve" button.
- The issues set out in this note also arise in respect of any staff who do not have Your HR access. However, in this case an additional step is required, which is that where such a member of staff has a declaration to make then line managers must download a copy of the declaration form (available on the [Register of Interests](#) page on the Intranet), read it out to the staff member and complete it using that staff member's answers. It is this completed form that the line manager will either approve or reject and will then upload to HR-ER.
- By reading and approving/rejecting the returns line managers assist the quality control process by ensuring the information provided is complete.
- In addition, and most importantly, line managers must know what their team members' interests are, if any. It is for line managers to ensure that any conflicts of interests registered by a member of their team do not lead to that team member being allowed to work in the area where his or her conflict manifests.
- Line managers must assess whether the interest declared by a member of their team is "relevant". It is difficult to give generic guidance on this to cover all circumstances. Clearly many interests are registered that are not actually relevant, for example:
 - I am a member of my son's school's PTA;
 - My husband runs the local judo club.

Where that member of staff works in a role where he or she is involved in approving or administering any grants or finances to such bodies then the above interests may be a problem. A lot will therefore depend upon what the member of staff's job involves.

- In respect of secondary jobs or appointments, where these create a potential conflict with the staff member's role, then they may need to be declared on the Register of Interests. If in doubt, it is better to declare it. Even where such roles do not need to be declared on the Register of Interests, all members of staff are required to seek the permission of their line manager if they want to engage in any other business or take up any additional appointment. This is set out in the [Employee and Employer Responsibilities Code](#). It is therefore worth reminding your staff members about this when you check their declarations.

The mischief we are seeking to stop here is where someone in their job at WCC can influence something that they have an interest in outside of work. For example, where a person is involved in letting a contract or evaluating tenders and they or a family member also has an interest in a company who could submit a bid that they would then be involved in evaluating etc.

In the vast majority of cases, it is appropriate and well within a manager's judgement to spot these issues and ensure the member of staff is not involved in this work. Where the member of staff's work is such that this is an ongoing problem then it may be that they are not suitable for the role and advice should be taken from HR and legal services.

Where a manager is unable to decide whether a conflict of interest exists then he or she should in the first instance seek to determine this issue with his or her own manager. In exceptional circumstances it may be necessary to seek advice from legal services to determine the issue.

Warwickshire Legal Services
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