



**STANDARD OPERATING PROCEDURES:  
OFFICE OF THE BEDFORDSHIRE POLICE AND CRIME COMMISSIONER**

<b>Title</b>	Declaration of interests
<b>Area of Compliance</b>	Business and Compliance
<b>SRR Ref. No.</b>	PCC – SR8
<b>SOP Ref. No.</b>	008/2015
<b>Version No.</b>	Version 1.0
<b>Senior Lead</b>	Chief Executive
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**Revision History**

<b>Date</b>	<b>Revision</b>	<b>Change</b>	<b>Section</b>	<b>Review Date</b>
November 2015	1.0	New Document		

**1. Purpose**

1.1 The purpose of this document is to provide a clear process in considering business interests and is seen to be conducted to the highest standards of ethics and integrity.

1.2 By adhering to this document the OPCC will be compliant with their contractual obligation to ensure that they do not place themselves in a position where duty and private interest conflict.

**2. Background**

2.1 The OPCC in receipt of public and other funds has a duty to fulfil the highest standards of corporate governance. The OPCC is therefore committed to the accepted principles of public life, which embrace selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

2.2 It is very important therefore that if a member of staff has a private interest, financial or otherwise, which could overlap with their duties as an employee of the OPCC then this interest must be disclosed and managed appropriately.

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2.3 In order for the OPCC and its employees to maintain the highest standards of integrity and reputation, it is essential that all employees declare any interest that they, or members of their family, may have that could give the appearance of a conflict, even where no actual conflict exists.

### 3. Affected persons

3.1 The existence of an explicit conflict of interest policy is not in any way intended to question the integrity of OPCC staff; OPCC staff are encouraged to engage in appropriate external activities but it is necessary to have mechanisms to protect staff and OPCC from reputational damage or other liabilities. By engaging in such external activities, employees may place themselves in a difficult position in which an outside interest may conflict, or appear to conflict, with their OPCC duties. The employee may then be open to suspicion that decisions they take as an OPCC employee are influenced by personal financial interest even when the employee is acting with neutrality and complete professional integrity.

3.2 This policy will apply to all staff working in the Office Police & Crime Commissioner (OPCC) whether employed full-time or part-time, fixed term, permanent, seconded or on a temporary basis.

### 4. Strategic Risk Register

4.1 The Declaration of Interest Policy will be monitored within the Strategic Risk Register to ensure full adherence to the policy at all times.

### 5. Policy

5.1 An interest must be declared if it may impact on your work. Such interests may include but are not limited to:

- where an employee works for another organisation, whether OPCC related or not;
- any directorships of companies likely to be engaged with the business of the Trust;
- voluntary or remunerated positions, such as trusteeship, local authority positions, other public positions;
- membership of professional bodies or mutual support organisations, including political parties;
- investments in unlisted companies, partnerships and other forms of business, major shareholdings and beneficial interests;
- gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last twelve months;

- where a family member or close personal relationship exists with an external body or somewhere where you may be in a position to award services to;
- any other conflicts that are not covered by the above.

5.2 Staff should therefore declare any interests to their employer by completing the declaration of interests form and submit this to their Line Manager. Line Managers will record the interests and make a decision on whether the declaration is deemed to be one which requires existing internal processes to be enhanced to ensure transparency in the processes undertaken to avoid a conflict presenting itself.

5.3 The declaration of interests must be uploaded onto the OPPC website to ensure transparency.

5.4 All interests should be declared as and when they arise and not only as a result of an annual declaration. Individual members of staff are responsible for ensuring that their registered interests are kept up to date at all times.

5.5 Although the interest may be declared, this does not remove the member of staff's personal responsibilities of removing themselves from a position or situation which may result in a potential breach of this policy.

### **Bribery Act 2010**

5.6 Under the Bribery Act 2010, any money, gift or consideration received by an employee from a person or company seeking a contract within the OPPC will have been deemed to have been received under a bribe. Any gift received from a supplier such as pens, pencils or calendars may not be declared but if unsure, clarification should be sought from your Line Manager. Any hospitality other than meals or buffets provided by suppliers must be declared in writing (following the guidance of OPPC Gifts and Hospitality Policy).

5.7 If an employee feels that they have been offered an incentive or bribe to place an order or contract, this should also be declared in writing immediately.

### **Raising Concerns**

5.8 Staff that have any concerns relating to a declaration of interest or a private transaction are encouraged to report it to their Line Manager as soon as possible.

### **Failure to Make a Declaration**



5.9 Should it be suspected that a member of staff has failed to appropriately declare an interest, or failed to demonstrate compliance with the conduct outlined in this policy, it may be deemed appropriate to take action in line with the organisation's Disciplinary Policy.

## 6. Responsibilities

6.1 Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Chief Executive. Managers will ensure that they and their staff operate within this policy and arrangements, and that all reasonable and practical steps are taken. Each manager will ensure that:

- All their staff are aware of the policy and the arrangements, and the reasons for the policy;