

To: Councillor Emberson (Chair)
Councillors Terry, Ennis, Keane and Mpofu-Coles

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NOTICE OF MEETING - PERSONNEL COMMITTEE 12 MARCH 2026

A meeting of the Personnel Committee will be held on Thursday, 12 March 2026 at 6.30 pm in Committee Room 1, Civic Offices, Reading. The Agenda for the meeting is set out below.

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PERSONNEL COMMITTEE MINUTES – 20 NOVEMBER 2025

Present: Councillor Emberson (Chair);
Councillors Ennis, Keane, Mpofu-Coles and Terry.

Also Present: Kathryn Cook, Louise Duffield, Kieran McGee, Alison McNamara and Miriam Palfrey.

6. MINUTES

The Minutes of the meeting held on 17 July 2025 were confirmed as a correct record and signed by the Chair.

7. PAY GAP REPORTS FOR 2025 AND WORKFORCE PROFILE REPORT FOR 2024-25

The Committee considered a report that presented the Council's Gender, Ethnicity and Disability Pay Gap reports for 2025. A copy of the Gender Pay Gap Report was attached to the report at Appendix 1, a copy of the Ethnicity Pay Gap Report was attached at Appendix 2, a copy of the Disability Pay Gap Report was attached at Appendix 3 and a copy of the Workforce Profile 2024-25 was attached to the report at Appendix 4.

The report stated that the gender pay gap was -0.33% and the median was 0.00%, this compared to the previous year's figure of 1.57% mean and 0.00% median. The mean ethnicity pay gap for 2024 was 2.85% and -0.27% median, compared to the previous year when they had been 4.17% and -0.68% median. The mean disability pay gap was 2.98% and the median was 2.13% compared to the previous year when they had been 2.05% mean and 0.00% median.

The report also presented the Workforce Profile for 2024/25 which provided a summary of equalities monitoring data and trends over time. It covered data on the protected characteristics of the current workforce and job applicants in 2024/25 and compared it to the previous three financial years where relevant.

Overall, the Council continued to demonstrate strong performance in workplace equality, with the gender pay gap indicating near parity in average earnings between men and women. Ethnicity and disability pay gaps remained modest, with targeted actions underway to address disparities and improve representation at senior levels.

It was noted at the meeting that the next set of pay gap reports and Workforce Profile would include the Directorate of Children's Services, which had transferred from Brighter Futures for Children to the Council on 1 October 2025. The effect of this on the statistics in the reports would need to be made clear.

Resolved: That the Gender Pay Gap Report, the Ethnicity Pay Gap Report, the Disability Pay Gap Report and the Workforce Profile 2024-25, as attached to the report at Appendices 1, 2,3 and 4, be noted.

8. UPDATE ON RBC'S INCLUSION AND DIVERSITY STRATEGY AND PLAN

The Committee considered a report that provided the annual update, year 2 progress, on delivery of the Inclusion and Diversity Strategy. The following appendices were attached to the report:

Appendix 1 Inclusion and Diversity Strategy 2024-2026;

PERSONNEL COMMITTEE MINUTES – 20 NOVEMBER 2025

Appendix 2	Anti-Racism Statement and Actions for 2025;
Appendix 3	Inclusion and Diversity Year two Plan Update;
Appendix 4	Inclusion and Diversity Year three Delivery Plan Proposal.

The report stated that most of the people who worked for the Council lived locally with approximately half of the workforce (54%) living in the Borough and a further 33% had an RG postcode (87%). The aim was for the Council to have a workforce that reflected and understood the communities it served and to be seen as an employer of choice within the Council's communities and one that valued inclusion and diversity and the different perspectives they brought. Progress had been made since the launch of the Inclusion and Diversity Strategy including the following:

- A steady increase in the ethnic diversity of staff and the development of a more representative leadership team;
- Launch of the "Reverse Mentoring for Inclusion" pilot programme;
- Publication of Pay Gap Reports and Action Plans (see Minute 7 above);
- Production of an Anti-Racism Statement and Action Plan for 2025;
- Launch of an Inclusive Recruitment workshop;
- Updating the Council's four core HR Policies: Bullying and Harassment, Disciplinary, Grievance and Managing Poor Performance, to ensure that they continued to reflect best practice.

The report explained that progress was shared with all staff through a supporting comms campaign and members of the Corporate Management Team Chaired, on a rotation basis, a quarterly meeting with Chairs of the Staff Networks as part of the governance of the Strategy. Meetings had been held with Councillors over the previous 18 months about the Council's strategy for inclusion and diversity for its workforce and a keen interest had been shown in the Anti-Racism Statement. The statement related to the Council's workforce however, Councillors were also being engaged in working towards a broader Boroughwide public statement. Progress had also been made with the agreed milestones for the Inclusion and Diversity Strategy and this was set out in a table in the report.

The priorities for the third year of the Plan, starting in January 2026, listed areas that needed to be addressed that were felt to still require attention to ensure the delivery of the Inclusion and Diversity Strategy and included the following:

- A communications campaign for the Anti Racism statement and continuing to progress the agreed actions;
- Developing and rolling out a series of Inclusion and Diversity workshops;
- Support for Progression;
- Continued delivery of Inclusive Leadership workshop;
- Policy Review;
- Disability Inclusion.

The report explained that Staff Networks, organisational leaders and Team Reading Stakeholders had been asked to comment on any further priority areas that would support achievement of the Council's ambition for Inclusion and Diversity during year three of the Strategy. To date feedback had included a focus on Disability Inclusion (invisible disabilities such as neurodiversity, epilepsy, narcolepsy), Carers (unpaid or family carers) and Menopause. These would be considered as part of the year three delivery.

PERSONNEL COMMITTEE MINUTES – 20 NOVEMBER 2025

Resolved: That the progress that had been made in relation to the delivery of the Council's Inclusion and Diversity Strategy be noted.

9. REDUNDANCY AND SPECIAL SEVERANCE PAYMENT COSTS – 1 APRIL 2025 TO 30 SEPTEMBER 2025

The Committee considered a report that provided a summary of Special Severance Payments that had been made between 1 April 2025 and 30 September 2025. The report did not include termination costs for schools-based staff and stated that there had been no early retirements on the grounds of efficiency and no redundancies during the period.

Resolved: That the report be noted.

10. PROPOSED ARRANGEMENTS FOR MONITORING OFFICER, RETURNING OFFICER AND ELECTORAL REGISTRATION OFFICER STATUTORY ROLES

The Committee considered a report that outlined proposed arrangements to follow the upcoming departure of the Assistant Director of Legal and Democratic Services in December 2025. The post currently incorporated three statutory officer roles of Monitoring Officer, Returning Officer and Electoral Registration Officer.

The report explained that the Council had been advised that there was a challenging market for the recruitment of Monitoring Officers. To safeguard against this and to ensure continuity of cover, it was proposed to make an interim appointment for the role of Assistant Director and Monitoring Officer. Recruitment for a permanent replacement would then begin in early 2026. However, with elections scheduled for May 2026, it was considered that it would not be appropriate for these to be managed by an interim officer, and the report therefore proposed that the Returning Officer and Electoral Registration Officer roles be allocated to the Executive Director of Resources. The appointments would need to be formally approved at a meeting of Council. The report also noted that the Council could revisit the permanent arrangements for elections should it wish to, once it had been able to recruit to the substantive Monitoring Officer position.

Resolved:

- (1) That the proposed interim arrangements and recruitment process for the Assistant Director of Legal and Democratic Services/Monitoring Officer be noted;**
- (2) That the appointment of the Executive Director of Resources as Returning Officer and Electoral Registration Officer be recommended to Council.**

11 HEAD OF PAID SERVICE – CONFIRMATION OF PERFORMANCE REVIEW ARRANGEMENTS

The Committee considered a report that provided an update in respect of the arrangements for the performance review and target setting processes for the Head of Paid Service as required in the Council's Constitution. An extract from the Council's Constitution that set out the Personnel Committee's Terms of Reference was attached to the report at Appendix A.

The report stated that the Leader of the Council was responsible for setting performance targets for the Head of Paid Service each year. These performance targets were regularly

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reviewed, and the Leader held regular performance discussions with the Head of Paid Service to actively manage on going performance. If any development was required, this would also be discussed as part of these ongoing discussions.

Resolved: That the performance review arrangements for the Head of Paid Service be noted.

(The meeting commenced at 6.30pm and closed at 6.57 pm).

Personnel Committee

12 March 2026



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Title	Update on the Implementation of the Employment Rights Act 2025
Purpose of the report	To note the report for information
Report status	Public report
Executive Director/ Statutory Officer Commissioning Report	Louise Duffield, Executive Director Resources
Report author	Kathryn Cook, Director HR&OD
Lead Councillor	Councillor Ellie Emberson
Council priority	Ensure Reading Borough Council is fit for the future
Recommendations	1. That Personnel Committee notes the implementation plan for the provisions of the Employment Rights Act

1. Executive Summary

- 1.1. The Employment Rights Act became law on 18 December 2025. The Act will progressively introduce additions and amendments to existing legislation, including the Employment Rights Act 1996. The employment law changes included in the Act will happen in 2026 and 2027.
- 1.2. The provisions in the Act will impact on a number of current HR policies and these will be revised as set out in the Act. Not all of the provisions in the Act will apply to RBC.

2. Policy Context

- 2.1 It is essential that RBCs HR policies are regularly reviewed to ensure they meet current legal obligations. The changes required by the Employment Rights Act 2025 will impact on a number of HR policies over the period 2026-2027 and a schedule has been produced to ensure changes are made to our policies in a timely way. Please note that as the changes in the Act are required by law, they will not track to Personnel Committee for individual approval but policies will be brought for information as they are amended with clear information about what has changed.
- 2.2 In many areas where changes are proposed, Reading already has provisions to protect and support our employees in these areas and our policies often already offer more than is legally required. However a careful review will be undertaken in line with legislation.

3. The Proposal

- 3.1. A headline summary of the anticipated provisions of the Act and the amendments required to be made to RBC policies by the Council is at Appendix 1. A single 'master-tracker' has been developed to ensure the timely amendment of policies and this will be actively reviewed to ensure compliance and management of risk.

4. Contribution to Strategic Aims

- 4.1 The proposals in the policy review schedule will ensure RBC is legally compliant with the Employment Rights Act 2025. These policy changes will therefore contribute to the strategic aim to Ensure Reading Borough Council is fit for the future

5. Environmental and Climate Implications

- 5.1. Not applicable to this report.

6. Community Engagement

- 6.1. Not applicable to this report

7. Equality Implications

- 7.1. Not applicable to this report – the Council's HR policies require amendment to meet the requirements of recent legislation.

8. Other Relevant Considerations

- 8.1. None.

9. Legal Implications

- 9.1. The proposals will ensure that RBC is compliant with the provisions of the Employment Rights Act 2025.

10. Financial Implications

- 10.1 As policies are reviewed, any financial implications will be assessed and highlighted to Finance colleagues as appropriate.

11. Timetable for Implementation

- 11.1. See Appendix 1

12. Background Papers

- 12.1. There are none.

Appendices

1. Summary of the provisions of the Employment Rights Act and delivery timescales

Employment Rights Act –Headline schedule of changes

NB – where provisions are not expected to impact RBC, they have NOT been included in the table below. The impact of some changes is not yet known.

Phase	Key Changes	Policies impacted:
Phase 1 – Apr 2026	<ul style="list-style-type: none"> Statutory Sick Pay changes including SSP to be paid from the first day of illness, instead of the fourth day; the lower earnings limit will be removed – currently, workers must earn a minimum amount to be eligible for statutory sick pay 	Sickness Absence policy and Sick Pay entitlement;
	<ul style="list-style-type: none"> Paternity rights including day one rights 	Family Leave - Pregnancy/Maternity;
	<ul style="list-style-type: none"> Unpaid Parental; Pregnancy/Maternity protections; Various measures related to trade unions including an increase to the length of industrial action mandates, changes to notification requirements, ballots etc 	Trade Union policies
	<ul style="list-style-type: none"> Whistleblowing protections for sexual harassment 	Whistleblowing
Phase 2 – Oct 2026	<ul style="list-style-type: none"> Duty to prevent harassment including sexual harassment; 	Update Bullying & Harassment Policy; Zero Tolerance Policy
	<ul style="list-style-type: none"> Fire-and-rehire restrictions subject to secondary legislation 	Contracts; Grievance & Disciplinary Policies, Employment Stability Agreement
	<ul style="list-style-type: none"> Additional trade union rights including an updated Code of Practice on trade union recognition 	Trade union policies
	<ul style="list-style-type: none"> Public sector outsourcing – implications for terms and conditions 	TBC
	<ul style="list-style-type: none"> Introduction of the new Adult Social Care Negotiating Body 	TBC

Phase 3 – Jan 2027+

- Six-month unfair dismissal (from Jul 2026 hires);
- Bereavement leave;
- Flexible working – clarity about reasons for refusal;
- Zero-hours and low hours contracts;
- Gender pay gap & menopause plans
- Increased pregnancy and maternity rights
- Sexual Harassment - further measures

- Menopause action plans
- Changes to collective redundancy rules
- Trade Unions – further changes including electronic voting

- Introduction of the School Support Staff Negotiating Body (SSSNB) for school support staff

Update Dismissal (affects Employee Stability Agreement);
 Bereavement/Compassionate leave;
 Flexible Working; Zero-hours/Casual contract

Pay Policy
 Parental policies
 Update Bullying & Harassment Policy;
 Zero tolerance policy

TBC
 Employment Stability Agreement
 Trade unions

TBC

Personnel Committee

12 March 2026



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Title	Conflict of Interest - Policy
Purpose of the report	To note the report for information
Report status	Public report
Report author	Kathryn Cook – Director of Human Resources and Organisational Development
Lead Councillor	Cllr Ellie Emberson – Lead Councillor for Corporate Services and Resources
Corporate priority	Our Foundations
Recommendations	That Personnel Committee notes the creation of a standalone Conflict of Interest policy building on the current provisions in the Code of Conduct, to reflect recent legislative changes.

1. Executive Summary

- 1.1 The Council's employment policies are regularly reviewed to ensure they remain current, accessible, and aligned with best practice. This report introduces a standalone Conflict of Interest Policy developed in response to the recently introduced Failure to Prevent Fraud offence, under which the Council may be held criminally liable if it fails to prevent fraud committed by employees or associated persons.
- 1.2 The new policy strengthens governance arrangements by introducing mandatory annual Declarations of Interest for all staff, including the submission of a nil return where no interests exist, together with a renewed requirement for staff to update their declaration immediately if circumstances change. These measures ensure that the Council maintains a complete and accurate register of interests, enhances transparency, and provides clear evidence of proactive compliance with legislative and audit expectations.

2. Policy Context

- 2.1 Good employment policies should support a culture based on trust, fairness, and inclusion. They can also speed the decision-making process by ensuring that clear guidance is readily available to cover a range of employment issues. Further, they can assist in avoiding employment tribunal claims by providing guidance for managers that reflects accurately current employment law and good practice. It is therefore important that employment policies are clear, easy to understand and through regular review remain current.
- 2.2 ACAS Codes of Practice give authoritative advice in key areas of employment practice. A failure to follow the Code does not make a person or organisation liable to proceedings. However, employment tribunals will take the Code into account when considering relevant cases. Tribunals will also be able to adjust any awards made in relevant cases by up to 25% for unreasonable failure to comply with any provision of the Code (by an employer or an employee).

3. The Proposal

- 3.1 Under the Failure to Prevent Fraud offence (introduced 1 September 2025), the Council may be held criminally liable if it fails to prevent fraud committed by employees or associated persons, unless it can demonstrate that reasonable and proportionate fraud prevention procedures are in place. This includes having clear governance frameworks, effective monitoring, and documented controls, to mitigate the risk of prosecution and reputational damage.
- 3.2 A key area of concern has been the management of employee conflicts of interest. Currently, staff Declarations of Interest (DOI) are not renewed annually. This creates a risk that new business interests, secondary employment, or personal relationships may go undisclosed, leaving the council exposed to allegations of bias or impropriety. Without regular updates, it becomes difficult to evidence compliance with statutory requirements and to defend decisions if challenged.
- 3.3 To address this, we have created a standalone Conflict of Interest Policy (building on current expectations in the Code of Conduct) to reflect our obligations under the Failure to Prevent Fraud offence. Declaration of Interest submissions will be mandatory on an annual basis for all staff, regardless of whether circumstances have changed. Staff will also be required to update their declaration immediately if a new interest arises. This will enable RBC to demonstrate proactive compliance with the new legislation, strengthen transparency, and reduce RBC's exposure to fraud, corruption, and procurement risks. It will also create a clear audit trail, evidencing that the council has taken reasonable steps to prevent conflicts and misconduct, thereby protecting both staff and the organisation.
- 3.4 The Conflict of Interest Policy has been drafted to reflect these changes - building on the current Code of Conduct (Appendix 1). Process changes will be made upon Personnel Committee approval of the Policy and a communications campaign is under development to ensure its implementation.

4. Contribution to Strategic Aims

Revised HR policies help to ensure that the Council can meet its legal obligations and Corporate Plan priorities, specifically in this instance. ensuring that the Council is fit for the future.

5. Environmental and Climate Implications

There are no environmental or climate change implications

6. Community Engagement

Not applicable.

7. Equality Implication

This policy applies to all Council employees, casual and temporary staff, agency workers, contractors, consultants, and those working on behalf of the Council. As it introduces consistent requirements for the declaration and management of interests across the entire workforce, it does not create any differential or disproportionate impact on individuals with protected characteristics. The policy therefore has no direct equality implications, and its universal application supports fairness, transparency, and consistent organisational standards.

8. Legal Implications

Certain employment policies and procedures are specifically needed to comply with legal requirements, for example, a written health and safety policy. Even where a policy or procedure is not specifically required by law, employers often find it helpful to have a policy in place to provide clear guidance that reflects the legal framework for handling the issue in question and it also helps employees to be clear about the organisation's stance on a particular subject. The proposed policy presented in this review reflect current employment law and ACAS Codes of Practice and/or guidance where relevant.

The new Failure to Prevent Fraud offence places a legal obligation on the Council to demonstrate that reasonable and proportionate fraud-prevention procedures are in place. The creation of a standalone Conflict of Interest Policy, coupled with annual declarations and immediate updates, strengthens the Council's ability to evidence compliance and reduces legal exposure arising from undisclosed interests or improper decision-making

In addition, employees are legally required under Section 117 of the Local Government Act 1972 to declare any direct or indirect pecuniary interest in a Council contract, with failure to do so constituting a criminal offence. The revised declaration process reinforces compliance with this duty and builds a clear audit trail to support governance and legal assurance.

Taken together, the updated policy and associated processes ensure that the Council's approach to conflicts of interest is legally sound, transparent, and aligned with current statutory expectations, thereby strengthening organisational resilience and reducing potential risk of challenge.

9. Financial Implications

There are no financial implications arising from this report.

10. Background Papers

Appendix 1 – draft Conflict of Interest Policy

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Conflict of Interest Policy

February 2026



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Document History	
Version	1.0
Status	Draft
Date	February 2026
Target audience	All employees of Reading Borough Council with the exception of Schools based staff, the Head of Paid Service, Section 151 Officer and the Monitoring Officer for whom alternative procedures apply
Ratification	None
Author	HR Employment Services Team

Version control	Reviewers
Version 1.0	Shared with trade union colleagues, but no comments received Approval by Personnel Committee
Version 1.1	
Version 1.2	

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1. Introduction

- 1.1 The Council (RBC) is committed to maintaining the highest standards of integrity, transparency, and public trust. Employees must avoid situations where personal interests could conflict, or appear to conflict, with their duties to the Council.

This policy safeguards the Council's integrity by preventing, identifying, declaring, recording and managing actual, potential, or perceived conflicts of interest. It ensures decisions are taken impartially, transparently, and in the public interest, and that we comply with the Seven Principles of Public Life (the Nolan Principles) and relevant legislation.

For roles in regulated services, including Children's Services, additional scrutiny or conditions may be applied where secondary employment or external interests present heightened safeguarding, reputational, or regulatory risks.

2. Scope

- 2.1 This policy applies to all Council employees, casual and temporary staff, agency workers, contractors, consultants, and those working on behalf of the Council (including secondees). School-based staff follow local arrangements where applicable

3. Definition of a Conflict of Interest

- 3.1 A conflict of interest arises where personal, financial, or other interests could compromise or be perceived to compromise an individual's impartiality, integrity, or objectivity in performing their Council role. Conflicts may be actual, potential, or perceived.

Where there is any doubt as to whether an interest constitutes a conflict, it must be declared.

3.2 Illustrative examples (not exhaustive):

- A financial interest in a supplier/contractor/organisation bidding for work.
- Close personal relationships (family, partner, close friend) with individuals employed by, or connected to, a tenderer, contractor, or applicant.
- Involvement in evaluating/awarding/managing contracts where you or a close associate has an interest in the outcome.
- Gifts, hospitality or incentives from suppliers/applicants/bidders that could influence, or be seen to influence, decision-making
- Secondary employment or private business activities intersecting with Council duties, particularly where time or role overlap could affect impartiality or performance

4. Responsibilities

4.1 All Staff (employees, workers, agency, contractors)

- Disclose immediately any actual, potential, or perceived conflict (including secondary employment/business interests).
- Refrain from participation in any decision-making, evaluation, procurement or contract management activity where a conflict exists, unless a written management plan/dispensation is in place.
- Treat all work information especially procurement, tender, evaluation and commercially-sensitive materials as confidential.
- Comply with the Council's Gifts & Hospitality, Code of Conduct, Anti-Fraud/Bribery/Corruption, Whistleblowing, and Information Governance policies.
- Complete annual declarations (including "nil returns") and update immediately if circumstances change.

4.2 Managers

- Create a culture of early declaration, ensure annual reminders, and review team returns.
- Assess conflicts promptly, agree management plans (e.g., recusal, supervision, task reassignment), and record decisions. Management plans must be agreed by the line manager and HR, with advice from the Monitoring Officer where the conflict relates to procurement, commissioning, or senior roles.
- Escalate complex/strategic cases to HR and the Monitoring Officer

4.3 Directors & Executive Directors

- Ensure directorate procedures and procurements integrate conflict checks and supplier conflict declarations.
- Oversee compliance and report significant issues to the Director of HR & OD and/or the Head of Paid Service.

4.4 Human Resources

- Maintain the register (HR system workflow), provide training and annual prompts, and support managers with case advice.

4.5 Monitoring Officer

- Provide governance advice, maintain oversight of significant/strategic conflicts, and report these as appropriate to the Head of Paid Service and ensure alignment with standing orders/contract procedure rules.
- Provide corporate oversight and reporting/monitoring

5. Declaration Requirements

Under Section 117 of the Local Government Act 1972, employees are legally required to notify the Council in writing of any direct or indirect pecuniary interest in any contract, or proposed contract, with the Council. Failure to do so is a criminal offence.

5.1 What must be declared

Any interest that could reasonably be seen to affect impartiality, including:

- Financial interests in suppliers/partners (you or close associates).
- Relationships (family, partner, close friend) with tenderers, suppliers, applicants.
- Secondary employment or self-employment/companies you own or manage.
- Gifts & hospitality offered/received (follow the separate policy and thresholds)

5.2 When to declare

- On appointment, annually (including submission of a “nil return” where no interests exist), and immediately when circumstances change.
- Before taking part in procurement/commissioning or any decision with a potential conflict

5.3 How to declare

- Complete the Declaration of Interests Form. Manager reviews and agrees a management plan or escalates. Records are held on the central register. Management plans must be agreed by the line manager and HR, with advice from the Monitoring Officer where the conflict relates to procurement, commissioning, or senior roles.

6. Secondary Employment & Private Business Activities

6.1 Requirement to declare and seek approval

- The Council does not prohibit you from taking secondary employment and will not unreasonably withhold permission for you to do so, provided that the second job does not present an insurmountable conflict of interest with your role here or the work of the Council.
- Employees must declare any secondary employment (paid or unpaid) or business activity that could intersect with your Council role before commencing and keep this under annual review. Approval may be conditional (e.g., no overlap with working hours, no access to related contracts, periodic review).
- Secondary employment or private business activities must not be undertaken during Council working hours, using Council systems or assets, or in a way that impacts performance, attendance, health, safety, or wellbeing.

6.2 Working time, rest and performance

- Employees must ensure that any secondary employment does not result in a breach of the Working Time Regulations, including limits on average weekly working hours, minimum rest periods, and statutory breaks. This applies to total working time across all employments, not just the Council role.
- Employees are responsible for notifying their manager if secondary work may affect compliance with working time limits. The Council may refuse, restrict, or withdraw approval for secondary employment where working time, health and safety, or service risks cannot be adequately managed.
- Breaches of working time requirements, or failure to disclose relevant working hours, may constitute misconduct and, in serious cases, gross misconduct.

6.3 Procurement and commissioning safeguards

- Staff with secondary employment or business interests must not participate in related procurements, evaluations, or contract management. Where unavoidable, a written management plan (e.g., recusal) is required and documented

7. How Conflicts are Managed

7.1 Depending on the nature, the Council may implement one or more of the following controls:

- Recusal from the matter/decision/meeting/evaluation panel.
- Reassignment of duties or additional supervision.
- Information barriers (access restrictions to systems/documents).
- Formal dispensation in limited, justified circumstances, recorded and time-bound.
- Prohibition of the activity where risks cannot be effectively mitigated

All decisions and rationales must be documented and provided to HR for inclusion on the central register and, where appropriate, the employee's personnel file.

8. Confidentiality and Data Protection

Declarations will be handled in line with data protection principles. Only those with a genuine need-to-know will access the register. Aggregated, anonymised insights may be used for governance reporting.

9. Non-Compliance

9.1 Failure to declare, late declaration, or breach of an agreed management plan or cooperate with an investigation may result in:

- Disciplinary action up to and including dismissal
- Removal from procurement/decision-making roles
- Possible referrals under anti-fraud/bribery procedures and to relevant authorities

- Where applicable, breaches of LGA 1972 s.117 and the Bribery Act 2010 may attract criminal sanctions.

10. Related Policies

- Employee Code of Conduct
- Gifts and Hospitality Policy
- Anti-Fraud, Bribery and Corruption Policy
- Whistleblowing Policy

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