

legal services



COMMISSION

STAFF CODE OF CONDUCT

EFFECTIVE FROM:

JULY 2011

STAFF CODE OF CONDUCT

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1. INTRODUCTION

All staff employed by the Legal Services Commission (LSC) are required by their terms and conditions of employment to comply with this Code of Conduct. The Code exists to help and protect the integrity of staff members and the Commission and is consistent with the values, behaviours and attitudes that underpin our organisation, as set out in the [Employee Charter](#).

As a member of LSC staff you should familiarise yourself with the Code and comply with its principles, seeking advice from either your line manager or other appropriate contact if you are ever unsure about any of the requirements. You should bear in mind that breaching this Code could lead to disciplinary action and that your responsibilities to comply with certain principles would still exist upon leaving the LSC.

The Code is intended to sit alongside (and not replace) any other codes of conduct, manuals or guidance documents that cover specific areas of the LSC's work and applies in addition to any codes of professional conduct that may be applicable to certain employees¹.

The Code will be reviewed every three years, but it may be amended at any time should the need arise.

¹ For example, lawyers employed by the LSC should follow the guidance agreed with the Law Society and Bar Council contained within the [Code of Conduct for Commissioners](#).

2. CORPORATE RESPONSIBILITIES

Accountability:

- You are **accountable** through your line manager to the Chief Executive
- The Chief Executive is accountable via the Chair to the [Commission](#)
- The Commission is accountable via the Chair to the Justice Secretary
- The Justice Secretary at MoJ is accountable to Parliament for the independence, effectiveness and efficiency of the LSC.

This means you should:

- carry out your duties **reasonably and according to the law**
- always act with **integrity, impartiality and honesty**
- **co-operate** with colleagues, managers, the Executive Team, Commissioners, MoJ officials, Parliament, the National Audit Office (the LSC's external auditors) or members of the public and never deceive or knowingly mislead anyone
- ensure the economic, effective and efficient **use of public money**
- be aware of the LSC's commitment to [environmental sustainability](#) and [equality and diversity](#)
- abide by the **LSC's [anti bullying and anti harassment](#) policies**
- ensure that you are **aware of your health and safety responsibilities** as set out in the [LSC's Health and Safety Manual](#)
- abide by Government policy on **openness and responsiveness**, and comply with the *Freedom of Information Act 2000*
- ensure that you safeguard information which may be sensitive in accordance with the LSC's [information assurance policies](#) and protective marking scheme

All public sector staff should observe the *Nine Principles of Public Service Delivery*, at Appendix A.

3. CONFLICTS OF INTEREST

You must at all times act in the best interests of the LSC. All staff at the LSC must take steps to ensure that any conflict of interest which might arise relating to your work does not affect any decisions or actions taken by the LSC.

You must disclose all interests which could conflict with your duties, so that appropriate action can be taken to manage or resolve them.

As the LSC is a public body, we have to pay particular attention to the need to maintain independence. We are also subject to external scrutiny, including from the National Audit Office.

What is a conflict of interest?

A conflict of interest can affect any member of staff and can occur internally between members of staff as well as externally. It is important that we deal with them appropriately.

A conflict of interest is a situation where there is a real conflict, a risk of conflict or the appearance of a conflict, between your personal interests (financial or otherwise) and the interests of the LSC, to the extent that you might not act at all times in the best interests of the LSC.

You must not exploit, or appear to exploit to your own or another individual's personal advantage any personal or professional relationships with another employee, a service provider or another third party.

The existence of a conflict of interest is not of itself a disciplinary offence. However, it is important that all conflicts are disclosed. Failure to disclose a conflict is considered a disciplinary matter.

In all situations, the way in which we deal with conflicts will depend on the specific circumstances. It is very important that each case is dealt with on its own merits, taking into account all the circumstance of your role and your interest.

In some cases it may be that, regardless of the conflict, you will be able to continue your work as if there were no conflict of interest. In other circumstances, the LSC might curtail or restrict your involvement in a particular matter.

What's the process?

You identify a potential conflict

You, or an objective third party, might consider it possible that you will be unable to act totally in the interests of the LSC. Think about conflicts arising in relation to family or other personal relationships (examples at page 7).

Talk to the right people

As soon as any conflict is identified you should talk to your line manager straight away and not try to resolve it by yourself. Your line manager will then decide on the appropriate next steps or resolve the conflict, if possible.

Next steps

If your line manager cannot resolve the situation they should speak to the Governance Manager. You may then be asked to complete a 'declaration of interests' form (at Appendix B). Copies of the form would then go to your line manager, the Governance Manager and the Director of HR and Organisational Development.

Decisions are recorded

The situation will be reviewed and a response issued within two weeks, outlining the reasons for any decisions. Records should be maintained in each department and regional office of the

decisions reached and the actions taken to manage or resolve the conflict.

If you are in key management positions, such as Directors or managers of large contracts, or have regular contact with service providers, such as Relationship Managers, you should be particularly aware of conflicts of interest and you must complete a 'declaration of interests form'. You should update the form as soon as your interests change.

In addition to the general disclosures mentioned above, you are also under a duty to declare to your manager and others as appropriate any conflict of interest which arises in the course of your work whenever it becomes relevant, for example at meetings or during discussions. A general disclosure of interests is not a substitute for this as other people need to be aware of the conflict in weighing up your views in the debate.

Examples of conflicts of interest

The following examples are intended to illustrate the issues; they are not definitive.

1. If a relationship manager's partner worked in a solicitors' firm that is one of their accounts, they should declare the interest and a colleague would probably take over that account.
2. If a senior manager who could influence the allocation of funding had a sister who was the partner of a firm of solicitors, this would have to be disclosed and recorded to offer transparency and alleviate any accusations of favouritism. If a decision needed to be made at a meeting about this particular firm, that person might be asked to leave the room.
3. If a contract auditor who had access to an individual criminal defendant's files wanted to become a special constable, there might be an irresolvable conflict, as the police are required to act to prevent and investigate all crime, whereas LSC staff members have a duty of confidentiality. For this reason, no members of PDS staff can become a special constable.
4. If a relationship manager wanted to serve as a magistrate, they might have a conflict if solicitors that they know appeared before them in court. However, if a person worked in an area of the organisation that does not have much direct contact with service providers, then there would not be a conflict.

4. GIFTS AND HOSPITALITY

The LSC recognises that you may be offered, or be expected to provide, gifts and hospitality in the course of business. All offers and making of gifts and hospitality, which may be to you or from you, must be recorded.

Gifts and hospitality are closely related to conflicts of interest and many of the principles are the same. This is an area of regularity and propriety that is particularly sensitive and subject to external scrutiny².

When you can accept or offer gifts and hospitality

You can accept or give gifts and hospitality in the following circumstances:

- Isolated gifts of a trivial character or inexpensive seasonal gifts
- Conventional hospitality in the course of business visits or relationships provided it is normal and reasonable in the circumstances.

How to decide about gifts and hospitality – see examples on page 10

In all circumstances you must:

- Make clear that gifts and hospitality are not accepted or given in return for, or in anticipation of, any action or inaction, or favour or disfavour to any person
- Follow procedures for recording offers of gifts and hospitality.

You should not use your official position so that you or any other third party gains any benefit which is outside the course of business. You should not receive any payment or other benefit from a third party, including gifts, hospitality or services, which might reasonably be seen to compromise your personal judgement and integrity, or put or appear to put you under an obligation.

² Under the Prevention of Corruption Act 1916, as a public servant you may be required to prove that the receipt of a gift or other consideration is not corrupt, or has not compromised your personal judgement or integrity.

Frequent offers from the same source should be discouraged and reported. You should take particular care to decline gifts and hospitality when the source is a contractor or potential contractor, especially when a tendering exercise is imminent or in progress.

If you have any concern about the acceptance of an offer, you should seek advice from your line manager in the first instance.

What is regarded as 'normal' and 'reasonable' will largely depend on the extent to which you are personally involved. For example, it is reasonable to accept invitations to working lunches in the course of official visits or business relationships, but they must not be frequent, regular or lavish. Similarly, you may accept low value tokens of appreciation offered to you in respect of speaking at conferences. In all cases these should be recorded in the hospitality register.

You may have to consider what is proportionate or appropriate in the circumstances, for example, if you have been sent a modest gift, to send it back may cause offence. In these instances, you are advised to use the gift for the general good of the LSC or donate it to charity.

The LSC also recognises that it might be appropriate in certain limited circumstances for you to offer modest hospitality to another party. For example, if you are a relationship manager, work with external consultants or contractors then in the course of a business meeting, some refreshments may be appropriate. In these instances, we ask that you consider the same principles outlined above, record all hospitality offered and seek advice if you are unsure.

How to record gifts and hospitality

Any offer of a gift, hospitality, award or other benefit that is made to or by a member of staff should be recorded on your departmental register. Each department should maintain its own register, recording origin of offer, details of the gift or hospitality offered, name of the person involved, an approximate value and whether or not it was accepted. A standard gifts and hospitality register is at Appendix C.

Gifts and hospitality registers should be reviewed regularly and signed off by the department Director. A record should be maintained of the dates of these reviews, with sign-off confirmed either by electronic signature or by email. Sight of registers of gifts and hospitality may be requested by the LSC's auditors or a member of the public under the Freedom of Information Act 2000.

The Governance team maintains and publishes a register of gifts and hospitality offered to the [Chair and Commissioners](#).

For further advice and feedback on gifts and hospitality, please contact the Governance Manager.

Examples of gifts and hospitality

The following examples are intended to illustrate the issues; they are not definitive.

1. If you are out of the office meeting a service provider for the whole day, you could accept a business lunch. If the provider offered you an evening meal, it might be appropriate to accept if it is linked to the course of LSC business, but if it was primarily social, you should pay for yourself or simply decline.
2. If you are a relationship manager and one of your firms offers you a bottle of wine at Christmas, you should not accept it.
3. If a contractor offers you a ticket to a sporting or social event, such as the football or the theatre, you should not accept as this would be perceived to be unrelated to LSC business and would be for your personal gain.
4. If you receive a box of chocolates from a person with whom you have been working as a token of their thanks, you could accept this and consider sharing it with other members of the team.
5. If a partner in a firm of solicitors offers you lunch every time you visit to see their files, and invites you to social events, you should decline and politely explain that you cannot accept such offers.

5. ALCOHOL POLICY

When social staff events are organised and the intention is that they take place on LSC premises, the following policy should be adhered to in relation to the consumption of alcohol³:

- Alcohol may only be consumed on LSC premises for social events such as fund raising, retirement or leaving functions and be in staff's own time and after 5pm
- A Director must give authority prior to the event and take overall responsibility for it
- Exceptionally Commissioners or the Chief Executive can authorise an event with alcohol at an earlier time
- No alcohol will be paid for by the LSC.

You should note that under employment law, the LSC's conduct principles still apply regardless of whether in work time or at the place of work, where two or more employees are present.

³ The LSC's general policy on drink and drugs is available on the [Shared Services](#) pages of the intranet alongside other employment policies.

6. POLITICAL ACTIVITY

The LSC must preserve its impartiality as it is important that Ministers and the public have confidence that staff's personal party political views do not compromise the LSC's work or undermine the public perception of the LSC's impartiality.

This guidance is concerned with party political activities liable to give public expression to political views, rather than with privately held beliefs and opinions. It is not intended that these restrictions should affect trade union activities.

The LSC aims to allow you the maximum level of freedom to participate in public affairs, subject to the operational requirements of the business where these need to be taken into account.

Politically sensitive areas of work

There are a number of categories of political activity that are subject to particular restriction in accordance with Cabinet Office and MoJ guidelines. You should note that there are particularly sensitive areas of work where your political impartiality could come under most scrutiny. Those affected might include:

- People who regularly speak for the Government or the LSC in dealings with commercial undertakings, pressure groups, local government or any other bodies, and who may appear to these organisations to have influence in the application of Government or LSC policy affecting them
- People whose duties involve a significant amount of face-to-face contact with individual members of the public and who make, or may seem to the public to be involved in making, decisions affecting them, and whose political activities are likely to be (or become) publicly acknowledged.

How to manage political activity

Political activity should be dealt with as follows:

- If you work in these sensitive areas of LSC business and wish to become politically active you should first speak to your line manager
- You or your line manager can speak to the Governance Manager for advice
- To record any political activity in which you are involved, you should complete a 'declaration of interests form' (see conflicts of interests section and Appendix B)
- If you are advised that your work is incompatible with the political activity, a full explanation of the reasons for the decision will be provided
- You will have a right to appeal any decisions through the LSC's grievance procedure
- The LSC will consider the possibility of finding you a suitable alternative post. This may not always be possible in view of the operating requirements of the business, or may have the effect of limiting the range of experience that you may acquire.

Some people may already be involved in political activities, particularly at a local level. Where you are concerned that your political activities and your LSC role may conflict, you are advised to discuss the position with your line manager at the earliest opportunity. Every effort will be made to resolve the issue so that such community participation may continue.

Particular restrictions on your activities apply in the run-up to elections and referenda. Up to date information and guidance can be obtained from the Governance team.

7. SECOND JOBS

You may take on other work as long as:

- You agree this with your line manager before starting the work;
- It does not conflict with your duties; and
- You do not exceed the working time regulations.

If you do not do this, your manager may take action under the disciplinary procedure.

You will get written permission from your manager before taking up another job, whether paid or unpaid, while you are employed by us. This is because your manager needs to make sure that it:

- Is a reasonable and proportionate in the circumstances does not affect you negatively because it breaks the Working Time Regulations or health-and-safety regulations;
- Does not have a negative effect on your official work; or does not conflict with your official position, or with our interests, or damage public confidence in LSC.'

The LSC will not approve flexible working requests which ask to maintain full time hours, but over fewer days for the purposes of second jobs. The time off must be taken as flexi time, unpaid or annual leave.

8. REPORTING ARRESTS OR CRIMINAL CONVICTIONS

You must let your manager know immediately if you are arrested, imprisoned, charged, or convicted of any criminal offence, or if you receive a police caution, summons or reprimand. Your manager will then tell your head of department, or equivalent, and HR Business Partner.

If you drive as part of your normal working duties, you must let your manager know immediately about any traffic offences (except parking offences) where driving is part of your role.

Any action taken will depend on:

- The nature of the offence;
- The outcome of court proceedings;
- The effect on our reputation; or
- The effect on your ability to do your job effectively.

9. OPENNESS AND INFORMATION ASSURANCE

Freedom of information

As a publicly funded body the LSC is required under the Freedom of Information Act 2000 to respond to requests for information from the public relating to what the LSC does and why.

You should conduct all dealings with the public openly and transparently in accordance with the principles of the Act, subject to any statutory prohibition on the release of information.

As a matter of course, the LSC is expected to:

- Give reasons for decisions to people affected, wherever possible
- Publish the facts, together with commentary and analysis, that are considered relevant and important in relation to major policy proposals and decisions (normally to be made available when policies and decisions are announced)
- Publish explanatory material about the LSC's dealings with the public (including any rules, procedures, internal guidance and similar administrative manuals that will assist better understanding of the LSC's actions), except where publication could prejudice any matter which should properly be kept confidential under any exemptions in the Act.

In response to **specific requests**, the LSC is required to:

- Release information that it holds, including relating to its policies, actions and decisions and other matters related to its functions and areas of responsibility, unless the information is subject to one of the exemptions under the Act.

If you receive a specific request for information you should:

- Notify the Governance team via [e-mail](#), who will record the request on a database

- Deal with responses in accordance with the requirements of the Act and the latest internal guidance issued (see the [freedom of information pages](#) on the intranet)
- Seek any necessary advice from the Governance team, particularly in relation to complex cases or the application of any exemptions under the Act.

Information assurance

Information which is of a confidential nature, commercially sensitive or protected through other legislation may be exempt from disclosure. The public, for example, have the right to expect us to do our utmost to protect their personal data and we all have a responsibility to ensure that it is appropriately kept secure.

You should ensure that you prevent the disclosure of any information which is confidential. If you are unsure about whether or not you may disclose information, you should consult a member of the Governance team.

It is also important to ensure that you carefully look after any information that you have access to. All breaches of security are serious and can cause problems for the LSC. Working securely helps us avoid incidents such as losing files and laptops that hold personal data and enables us to provide a quality service. You must familiarise yourself with the LSC's [Information Assurance policies](#) and ensure that all LSC documents you are working with are appropriately [protectively marked](#).

You should be aware that:

- You owe a **general duty of confidentiality** to the LSC under common law, which remains **legally binding** after you have stopped working at the LSC
- Most **personal data** is protected under the Data Protection Act 1998. You must ensure that any personal data you handle in the course of your employment is securely held and that no one can obtain unauthorised access. Personal data should only be accessed by those in the LSC who need it to do their job and processed only for the reasons that it was provided. For advice

on the requirements of the Data Protection Act 1998 please liaise with the Governance team.

- You must not directly or indirectly reveal to any person any **confidential or commercially sensitive** information concerning the LSC or any third party, such as a service provider or client, except in the proper course of your work or as required by law. If in doubt about whether to release any information, you should consult the Governance team
- You must also do your best to prevent any **unauthorised publication or disclosure** of such information
- You should not discuss in public places any **individual cases or confidential work** that may be sensitive, and you should also be careful that such information is not overseen when you use laptops in public places, such as on trains or when working remotely
- You are under a **legal obligation** not to disclose to any unauthorised person any information supplied to the LSC in connection with the **case of any individual seeking or receiving legal services** (see below)
- If you knowingly or recklessly, without the consent of the LSC or the individual concerned, disclose or obtain from another person any personal data, or information contained within it, **you may be guilty of an offence** under the Data Protection Act 1998. You may also be guilty of an offence under the Access to Justice Act 1999 or the Legal Aid Act 1988.

Section 20 of the Access to Justice Act 1999 (in relation to cases granted public funding under that Act) and section 38 of the Legal Aid Act 1988 (in respect of legal aid cases granted under that Act) restrict the following:

- Information provided to the LSC or any court, tribunal or other person or body in accordance with its functions under those Acts

- Information relating to the case of an individual seeking or receiving services funded by the LSC as part of the Community Legal Service or Criminal Defence Service.

This information can only be disclosed in the circumstances set out in section 38(1)-(3) of the Legal Aid Act 1988 and section 20(2) of the Access to Justice Act 1999. For advice on the interpretation of the statutory provisions, please consult the Governance team via your line manager.

If you receive a request for the disclosure of personal information for the purpose of assisting in an investigation of, or prosecution of, an alleged offence, you should refer it to the Director of Case Management.

10. CONCERNS ABOUT IMPROPER CONDUCT

The LSC is committed to the highest standards of integrity and accountability. Improper conduct of any kind is unacceptable.

The LSC attaches great importance to identifying improper conduct. Any person at the LSC who suspects that a breach of duty may have been committed by a member of staff, or is informed of such by a third party, has an absolute duty to report the matter immediately.

If you raise concerns about improper conduct, your concerns will be taken seriously and will be investigated.

The guidance below sets out the LSC's whistleblowing policy, including how disclosures relating to improper conduct should be reported and how they will be dealt with. It also sets out the legal framework under the Public Interest Disclosure Act (PIDA) 1998, which exists to protect individuals who make a protected disclosure from any form of discrimination or harassment.

When to raise concerns

You should raise concerns (see the process outline on page 20) if you believe you are being asked to act in a way which:

- Is improper or unethical
- Is in breach of a professional code
- May involve possible maladministration, fraud or misuse of public funds
- Is otherwise inconsistent with this Code.

You should also draw attention to cases where:

- You are required to act in a way that, for you, raises a fundamental issue of conscience

- You believe there is evidence of irregular or improper behaviour elsewhere in the organisation, but where you have not been personally involved
- You receive from a third party, including other staff, civil servants or service providers, any allegations relating to improper conduct
- You have concerns about information risks or about data handling and information security.

Whistleblowing and protection for people making disclosures

The PIDA came into force in July 1999 to protect staff who report the wrongdoing of their colleagues. The Act applies to all staff including contractors and temporary workers. PIDA allows staff to claim compensation through an Employment Tribunal for any detriment or victimisation following a disclosure.

The legislation does not introduce a general protection for whistleblowers in all circumstances. You will generally be protected provided that you make a disclosure in good faith, reasonably believe that the information and any allegation contained in it are substantially true, and do not act for personal gain or malice.

A disclosure will be protected if, in the reasonable belief of the individual making it, it tends to show that one or more of the following has occurred, is occurring or is likely to occur:

- A criminal offence
- A failure to comply with a legal obligation
- A miscarriage of justice
- The endangering of an individual's health and safety
- Damage to the environment

- Deliberate concealment of information relating to any of the above.

Disclosures made to the media rather than through the correct channels will **not** be protected by the PIDA and if you make disclosures to the media you are likely to face disciplinary action which could lead to your dismissal.

You are reminded to take due care in ensuring the accuracy of information disclosed.

Confidentiality

Your identity as the individual making a disclosure will be treated in confidence as far as it is practical to do so, and particularly whilst an investigation is ongoing. If the outcome of an investigation leads to action being taken, you may be asked to provide a formal statement or act as a witness to give evidence in the case. If you need to provide a statement, you can choose to be accompanied by a union representative or work colleague.

After an investigation is completed, any individual who was involved can request information relating to the case under the [Data Protection Act 1998](#). Information identifying third parties, including whistleblowers, will be protected where it is justifiable to do so and will not be disclosed without consent.

What's the process?

You need to raise concerns

Consider the evidence and then speak to your line manager or, if there are difficulties with doing this, to:

- The Head of Internal Audit
- The Legal Director
- The Director of Human Resources and Organisational Development
- The Chair of the Audit Committee⁴

⁴ For concerns relating to a Commissioner or the Chief Executive you should report directly to the Chair of the LSC. For concerns relating to the Chair you should report directly to the Justice Secretary.

An investigation is carried out	Your concerns will be considered and appropriate action decided upon as soon as possible. If you made your disclosure via your line or another senior manager your protection under PIDA will apply.
You'll be kept informed	You should expect to be kept informed of progress, including of when the investigation is likely to be concluded. Correspondence will be sent to your home address.
If your concerns are upheld	Action will be taken to manage or resolve the situation.
If your concerns are not upheld	Providing the disclosure was made in good faith no action will be taken against you. If the disclosure is found to be malicious or vexatious, a range of further actions will be considered.

External disclosure – taking your concerns further

Where you do not feel able to approach your line manager or other senior manager in the LSC and you feel your concerns are sufficiently serious, you may make an external disclosure to a 'prescribed person' under the PIDA.

You can make an external disclosure relating to the conduct of public business, fraud, value for money and corruption in relation to the provision of centrally-funded public services.

The disclosure will be protected under the PIDA in the event that you suffer unfair discrimination or dismissal provided you:

- make the disclosure in good faith
- reasonably believe that the information, and any allegation it contains, are substantially true

- reasonably believe that the matter falls within the description of activities which are protected under PIDA.

The Comptroller and Auditor General (Head of the National Audit Office) is a prescribed person under the PIDA, and can be contacted at the following address:

The Comptroller and Auditor General
National Audit Office
157-197 Buckingham Palace Road
London
SW1W 9SP
Telephone: 020 7798 7000

You can also seek advice from the following sources:

- Public Concern at Work - www.pcaw.co.uk or on 020 7404 6609
- a recognised trade union representative
- an independent legal adviser.

If you have reported a matter and believe that the response does not represent a reasonable response to the grounds of your concern, you may, when all internal processes have been exhausted, report the matter in writing directly to the Director General, Access to Justice at the Ministry of Justice who will investigate the matter further.

Further guidance and information on whistleblowing is available at www.pcaw.co.uk.

Appendix A – Nine principles of public service delivery

Every public service should:	
Set Standards of Service	Set clear standards of service that users can expect; monitor and review performance; and publish the results, following independent validation wherever possible
Be Open and Provide Full Information	Be open and communicate clearly and effectively in plain language, to help people using public services: and provide full information about services, their cost and how well they perform
Consult and Involve	Consult and involve present and potential users of public services, as well as those who work in them; and use their views to improve the service provided
Encourage Access and the Promotion of Choice	Make services easily available to everyone who needs them, including using technology to the full, and offering choice wherever possible
Treat All Fairly	Treat all people fairly; respect their privacy and dignity; be helpful and courteous; and pay particular attention to those with special needs
Put Things Right When They Go Wrong	Put things right quickly and effectively; learn from complaints; and have a clear, well publicised, and easy-to-use complaints procedure, with independent review wherever possible
Use Resources Effectively	Use resources effectively to provide best value for taxpayers and users
Innovate and Improve	Always look for ways to improve the services and facilities offered
Work with Other Providers	Work with other providers to ensure that services are simple to use, effective and co-ordinated, and deliver a better service to the user.

Appendix B - Declaration of interests form

Senior staff⁵ are expected to use this form to provide details of all direct or indirect pecuniary and non-pecuniary interests⁶, which are relevant to your work at the LSC. This is because, if undeclared, such interests might be perceived by a third party as affecting your impartiality.

You should also declare interests in relation to close family. Close family includes (but is not confined to) a spouse, personal partner, parent, child (minor or adult), brother, sister or the spouses or personal partners of any of these, ie people who could influence or be influenced by you in any dealings with the LSC.

If you are in doubt about whether to disclose a particular interest, or have any other queries in relation to this, please seek advice from the Governance team.

Please complete this form and return in hard copy or electronically from your personal email. If you would prefer an alternative format please contact the Governance team.

1. Name and role at LSC

Forename and surname:
Role:

2. Other posts held

Please give details of your roles at the LSC, plus any posts or other employment that you hold or have held in the last five years, which relates to an organisation that is relevant to the LSC.

Name of organisation:
Nature of organisation:
Position within organisation:
Dates post held:

⁵ Directors or managers of large contracts, or people who have regular contact with service providers, such as relationship managers

⁶ Indirect pecuniary interests arise from connections with bodies/organisations which have a direct pecuniary interest or from being a business partner of, or being employed by, a person with such an interest. Non-pecuniary interests include those arising from membership of clubs and other organisations.

3. Financial relationships

Please give details of any sponsorships or financial or material support that you receive from any organisation falling within the LSC's sphere of statutory responsibility.

Please provide details if you or a close family member are connected with an organisation that receives funds from the CLS or CDS or the administration fund.

Name of related party and relationship:
Details of financial relationship:
Contact name and phone number:

4. Political activity

Please give details of any political activity that you are involved in (eg. holding office in a political party).

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5. Other interests

Please give details of any other relevant interests, including significant interests of close family members, i.e. ones which might influence your judgment, deliberation or action as a member of staff at the LSC, or which might be perceived by a reasonable member of the public as doing so.

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6. Signature and date

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Appendix C – Register of gifts and hospitality

Name of office or business unit:

Approved by: (Head of Department)

Date reviewed and approved:

Date	Name of staff member	Origin or recipient of offer	Details of gift or hospitality or service offered	Estimated value	Accepted/ declined/ ultimate destination