

Registering and handling interests – Guidance for Staff

Key points

- You must register all interests (“pecuniary disclosable interests” or other “significant disclosable interests”) as soon as they become apparent; and in any case within 28 days of your starting work at the GLA appointment or within 28 days of when you discover you have a new interest.
- You must consider at all times the perception of conflict of interest and when in doubt register/ declare and not participate in a decision.
- Where you have a number of different roles, you must be particularly sensitive to conflicts and be clear in which capacity you are acting.

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Changes from Previous version	Minor factual and layout changes Potential conflicts of interest should be reviewed on a case by case basis and raised with your line manager. Where a conflict of interest arises between an officer’s role at the GLA and their role as a GLA appointee to a position on an outside or GLA-owned or controlled organisation, then the staff member in question should remove themselves from either the GLA or company/organisation decision making process in which they have the conflict
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1 Introduction

The GLA is committed to the highest standards of conduct and good governance, complying with the seven principles of public life (the Nolan principles) that are the basis of the ethical standards expected of public office holders. To ensure that decisions are transparent and taken on their merits by decision-makers in the best interests of the GLA, all GLA elected members and staff, but particularly decision-makers, must openly declare their interests and other matters that might affect their work.

In 2019, the Committee for Standards in Public Life issued a report on local government ethical standards, which made a number of recommendations to government, alongside good practice recommendations. The GLA will ensure that our own standards at least match this practice and, in some cases, go beyond it.

2 Scope and Application

This guidance applies to all staff of the Authority, whether appointed by the Mayor (11+2) or by the Chief Officer as the GLA's Head of Paid Service, including where staff act as a director or member-representative in a company that the GLA owns or has shares in. It also applies to staff on fixed term contracts, those seconded into the GLA, and agency staff. Any consultant engaged by the GLA also needs to consider its applicability. GLA companies will approve appropriate and equivalent guidance for any staff they directly employ.

You should consider all potential interests that may lead to any appearance of bias or a conflict of interest, not simply financial/pecuniary ones. The Code of Ethics & Standards for Staff covers:

- financial interests: **"disclosable pecuniary interests"**; and
- wider non-financial interests that might affect you or your role at the GLA, called **"significant disclosable interests"**.

These are explained in further detail at **Part 3** below.

The role of senior staff

With regard to this Guidance, their role is to:

- take personal responsibility and lead by example in their own registration of interests, ensuring they update their registrations within 28 days of any change;
- ensure this guidance is widely understood within their own Directorate; and
- flag concerns with the Monitoring Officer and/or Governance team and seek their guidance on more complex issues, as appropriate.

Nolan principle- Integrity

Holders of public office must avoid placing themselves under obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

The role of line managers

With regard to this Guidance, their role is to:

- ensure that all staff are aware of the requirements to register their interests, including through induction; and
- escalate any concerns to senior managers, the Governance Team and/or the Monitoring Officer

The role of the Monitoring Officer

This is a statutory position under the Local Government and Housing Act 1989. Their functions include promoting high standards of ethical conduct in accordance with the Nolan Principles of Public Life. Working with the Authority's elected Members and senior staff, the Monitoring Officer has key responsibilities to ensure the GLA complies with these requirements, which include to:

- operate the GLA's wider Standards regime, include the registration and declaration of interests, gifts and hospitality received by elected members and GLA staff;
- report (to the Mayor and London Assembly) on contraventions or likely contraventions by any part of the GLA of any enactment or rule of law by elected Members or staff;
- report on any maladministration or injustice where the Local Government Ombudsman has carried out an investigation into GLA-related matters; and
- work with the GLA's other statutory officers and Governance Team to provide advice to the GLA on corporate governance matters, including matters relating to the proper use of the Authority's resources.

With regard to this Guidance, the Monitoring Officer will:

- oversee its implementation;
- maintain the register of individual interests, ad hoc declarations and keep up-to-date information;
- advise staff on issues relating to the registration and declarations of interests and handling of potential conflicts of interest;
- report any wrongdoing; and
- work with line managers as appropriate with regards to complaints against staff.

The role of the Governance Team

- With regard to this Guidance, the Governance Team will advise staff in issues relating in interests which they may raise in the process of drafting Decisions or other documents and support the Monitoring Officer in their role.

3. Types of interest that must be disclosed

The Code of Ethics & Standards for Staff covers “disclosable pecuniary interests” and “significant disclosable interests”.

“Disclosable pecuniary interest”

This is anything that is required to be disclosed and registered under **paragraphs 1 to 7** of the [GLA Group Register of Interests – Notification of Disclosable Pecuniary Interests Form](#) whether or not it has actually been registered.

It can be a criminal offence not to declare that you or your spouse or civil partner has an interest in a contract (including an employment contract) you or they have, or propose to have, with the GLA. Therefore, you should not interview spouses or civil partners for jobs or contracts with the GLA (or other “connected persons”- see below).

It is also a criminal offence to accept any fee or reward above your proper remuneration.

Informing the Governance Team and Monitoring Officer, registering the matter, and not participating in any decision to award that contract or to lobby or influence others to do so is likely to ensure no offence is committed.

“Significant disclosable interests”

This type covers *wider* interests or matters than those mentioned above that might reasonably be perceived as affecting you, or a person closely connected to you in some way, or influencing your conduct or actions in relation to your role or work at the GLA.

A “significant disclosable interest” arises if a matter:

- concerns a GLA employee or someone who is a “Connected Person or Organisation”, and
- the matter might reasonably be perceived as involving, or being likely to involve, the employee’s work or role at the GLA or its wider functions and activities; and
- the matter is likely to:
 - affect or influence the employee’s conduct or actions in relationship to that work or role; or
 - impact or affect the GLA employee or a Connected Person or Organisation to a significant extent (either positively or negatively).

A “Connected Person or Organisation” is:

- a GLA employee’s **spouse** or **civil partner** or **cohabitee** (someone they are living as if they were their spouse or civil partner);
- “**close family members**” of the GLA employee or their spouse/ civil partner/ cohabitee, defined as their: parents, grandparents, siblings, children, nieces or nephews;
- **personal friends** of the GLA employee or their spouse/civil partner/ cohabitee;

- Other persons or organisations with a **business relationship or some other significant business, social or personal connection** to the GLA employee or their spouse/civil partner/ cohabitee.

Note this registration requirement applies wider than close family members and includes personal friends, and persons or organisations with a business relationship or some other significant business, social or personal connection.

You must judge this objectively and with the full facts, but it is important to consider what the public's reasonable perception is likely to be. If your own particular work or role at the GLA is likely to be involved, then it will involve GLA functions and activities. However, this may also be the case if your own work or role is not affected and it involves someone else's.

A person cannot be held responsible for something they do not know about; however as soon as they become aware of having a significant disclosable interest, they are responsible and must act appropriately. For example, if you aren't aware that a cousin has applied to the GLA for a grant but then become aware of this you should declare a significant disclosable interest on the appropriate form.

4. Registration and declaration of interests

This applies to both "disclosable pecuniary interests" and "significant disclosable interests".

Senior staff

They are defined in Mayoral Decision-Making in the GLA (Scheme of Delegation) and include Mayoral advisors/Deputy Mayors (the 11+2). As they have formal delegated decision-making powers, they must make a published standing declaration. They must complete or update (within 28 days of becoming aware of an interest) the **GLA Group Register of Interests – Notification of Disclosable Interests Form** which can be found [here](#).

- Disclosable pecuniary interests are covered by paragraphs 1 to 7 of the form;
- Other registrable interests are covered by paragraphs 8 to 10.
- Significant disclosable interests – as defined above – are covered by paragraph 11, summarised as: *"Any other interest which I hold which might reasonably be perceived as affecting my conduct or influencing my actions in relation to my role."*

All other members of staff

They are required to register both types of interest (as applicable) using the shorter **General Notification of Significant Disclosable Interests Form** the latest version of which can be found [here](#). This is to be completed and signed by the relevant Executive Director within 28 days of becoming aware of the matter being disclosable and must be returned to their line manager and the Monitoring Officer. The form will be included in the register of interests maintained by the Monitoring Officer. Depending on the nature of the interest the Monitoring Officer may require the employee to complete the longer form used by Senior Staff.

5. Handling Interests

Deciding whether there is a potential conflict will depend on how closely you are involved with the GLA decision or work and whether the interest could potentially be seen as affecting your ability to make an objective and informed decision. If in doubt, seek advice from your line manager and the Governance Team, and always err on the side of caution. Ask yourself – could an outside observer perceive that the matter might potentially represent a conflict or mean that you may be influenced, biased or otherwise affected in some way?

If you think you might have a potential disclosable pecuniary interest or a significant disclosable interest you should:

- **think about the Seven Principles of Public Life**, in particular:
 - *Selflessness: Holders of public office should act solely in terms of the public interest.*
 - *Integrity: Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.*
 - *Objectivity: Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.*
- **raise it** with the Governance Team and your line manager to help decide whether you have a disclosable pecuniary interest or a significant disclosable interest. They can give support and get advice from the Monitoring Officer and Legal if appropriate.
- **register and declare it** using the correct form.
- **try and resolve it**: where appropriate, your line manager, Governance Team and Monitoring Officer may be able to agree actions and mitigations that would enable you to continue with your work or role if it is affected by the interest or matter, without there being a conflict.
- **step away from it**: if that is not possible then you should arrange with your line manager for someone else to take over that area of work.
- **not lobby for it** “behind the scenes” or otherwise promote your views or try to influence others’ decisions and actions.

Every potential conflict should be reviewed on a case by case basis and raised with your line manager; if in doubt seek advice from line manager/Governance Team/Monitoring Officer as appropriate.

There are a number of things you need to do, and over and above registering the matter as described at section 4, in particular circumstances where a disclosable pecuniary interest or a significant disclosable interest becomes apparent:

- When taking a decision, individual Decision Forms (Mayoral, Director or Assistant Director forms) should record whether or not there are any potential conflicts of interest and how they have been mitigated, including nil response where appropriate.
- In procurement, to preserve the integrity of contract and grant funding award processes, it is imperative proposals are evaluated objectively, consistently and without bias towards particular suppliers and/or recipients. Prior to the start of the process, all those involved in the evaluation must declare whether they have a disclosable pecuniary interest or a significant disclosable interest any interest and take appropriate action. If, after consulting with your line manager and the Governance Team, it is decided that a conflict of interest exists, the person concerned must remove themselves from the process. Procurement forms include a conflict of interest proforma. Remember it is a potential criminal offence not to declare that you or your spouse or civil partner has an interest in a contract (including an employment contract) you or they have, or propose to have, with the GLA.
- When on a Committee or Board, or a GLA group that bears on decision-making and which is discussing a matter in which you have a disclosable pecuniary interest or a significant disclosable interest, declare as soon as possible and take advice on whether to withdraw from consideration of the item in question.

Conflicts between GLA role and appointments to outside organisations, including GLA Companies

Conflicts can arise between your work and role at the GLA and your role as a GLA appointee to a position on an outside or GLA-owned or controlled organisation (e.g. as a director representing the GLA on a company's board (whether or not wholly owned by the GLA) or on the management committee of a trust or other organisation). Generally speaking, the GLA-appointee owes their *first duty to the company/ organisation*, as they, as a director, have a fiduciary duty towards it and therefore are bound by the relevant governance processes or company law that apply to that organisation when undertaking its business - not to the GLA. You must always be clear in which capacity you are taking any particular decision.

- Where the company/ organisation is wholly owned by the GLA then it is unlikely there will be a conflict of interest as their interests are likely to align. In most cases, GLA companies (e.g. GLA Land and Property and GLA Holdings) are largely integrated with GLA decision-making and a separation of roles is not necessary. However, other GLA companies operate at arm's length, or the GLA may be one of a number of shareholders/decision-makers.
- Where the company/organisation is not wholly-owned by the GLA, if there is a conflict of interest between it and the GLA then the staff member in question should remove themselves from either the GLA or company/organisation decision making process in which they have the conflict. This is likely to arise when the GLA-appointee feels constrained in taking the decision or being involved in the matter because of their GLA role, relevant Mayoral/ GLA policies or competing financial interests. If this is frequently the case, then it may not be appropriate for GLA staff to serve on the company.

6. Scenarios

Some potential scenarios are set out below which may assist you in considering whether conflict of interest arise.

Scenario 1: You are involved in a GLA procurement process. It becomes apparent midway through the process that your cousin works for a company which has submitted a bid to the GLA for the contract. What should you do?

Step 1: Clarify the facts. Is this a significant disclosable interest? It involves your cousin, and so a Connected Person or Organisation and they or their employer will obtain a financial advantage from the contract.

Step 2: Make the declaration of an interest as part of the procurement process and consider completing the register of interest form.

Step 3: Remove yourself from the process, if it affects you or your work and there is no practical way of mitigating a potential conflict.

Step 4: If you do remove yourself, be mindful of any subsequent communications you have with colleagues – who taking over from you – on the process.

Scenario 2: You are governor of a school in London which does not normally have any direct dealings with the GLA. You have heard mention at a governors' meeting that the headteacher might be involved in a GLA curriculum initiative, which you might be involved in at the margins from a policy perspective. What should you do?

Step 1: Clarify the facts. Is this a significant disclosable interest? It concerns the GLA's functions/ activities and potentially your GLA role.

Step 2: Register your interest, if you have not done so already, and declare the interest in the curriculum initiative.

Step 3: Ensure that any involvement you have in the curriculum initiative is appropriate and remove yourself, if it is not. It is not likely to be appropriate where your involvement in the curriculum initiative, in the opinion of an objective observer, could be perceived as conferring an advantage – or providing scope to confer an advantage – on the school.

Step 4: Ensure you have made the appropriate declarations in your role as a school governor.

Scenario 3: There are proposals in the draft London Plan which alter planning requirements in respect of properties that are within 800 metres of a railway station. You own such a property. Do you need to declare it?

Answer:

Where an interest would be equally shared by a significant number of people and is not related to a particular specific geographical location, you would not need to automatically declare it until it became a specific issue (for example you were determining a planning application relating to your neighbourhood). Senior Members of

Staff are required to list property interests (without having to reveal exact address) in their standing Register of Interests.

Scenario 4: You live half a mile or so from New Cross Gate station, which is proposed as a Bakerloo line extension station. Clearly you would benefit from this to an extent (extra travel option, possible house price impact). But equally a) by working on this you are trying to deliver a Mayoral policy and the proposed route is fixed and in the public domain; b) given the significant financial implications, it is impossible to absent yourself from involvement in this. How would you proceed under this policy?

Answer

There are no hard and fast rules here or way to codify this. The practical answer is staff would need to consider a number of things – what would a reasonable member of the public's view be? Are you particularly close to the site – is it next door, can you see it, hear it, how personally interested are you in it, have you lobbied on it via local community groups etc. You should discuss these issues with your Senior Manager and the Monitoring Officer.

7 Registering disclosable pecuniary interests

The registration of interests will be in the following common format for Members and Senior Staff, which reflects the standard template used across the GLA Group. These notes explain how to complete those forms, and cover requirements in terms of your and your partner's employment, shares, property and trustees, directorships and other connections.

No	Category	Explanatory notes	Additional Guidance/Examples/FAQs
1.	Details of any employment, office, trade, profession or vocation carried on for profit or gain by me or my <i>partner</i> (where you are aware your partner has the interest)	You do not need to include your membership of /employment by the relevant body/bodies specified at section A (this is usually the GLA for staff). In relation to any other employment, office, trade, profession or vocation carried out by you or your partner, the details should include the nature and title of the role, and name of any organisation for which the role is performed / which pays you or your partner for performing the role. Any staff who are also London borough councillors or, for	• "Partner" means your spouse, civil partner, a person with whom you live as husband or wife, or a person with whom you live as civil partners. • Your partner's employment should be included regardless of whether it has any connections with London. You should include their company and role but no need to identify by name if you do not wish to. • Other relatives are not covered by this. But see other references to 'close family'. • If you are an interim and employed through your own company, you should state this. • Include speaking or other fees earned.

		example, members of another Functional Body will need to include these details in this section of the form, because these are 'offices' and because some members will receive allowances for performing these roles.	
2.	Sponsorship		• This section is not applicable for staff. It is for elected members only.
3a	Details of any contract which is made between (i) myself (or my partner) and the relevant body/bodies specified at Section A of this form OR (ii) a member of my close family and the relevant body/bodies specified at Section A of this form under which (a) goods or services are to be provided or works are to be executed and (b) which has not been fully discharged.	In this section (3a to e), the following details need to be entered for each category: • the names of the parties to the contracts – so the relevant authority, and • either (i) your or your partner's name, or (ii) the name of the firm or body corporate (of which you or your partner is a director, or in the securities of which you or your partner has a beneficial interest); • the date on which the contract was entered into, and the duration of the contract; • a brief description of the contract: the goods or	• This Section specifically refers to 'close family'. See the definition of "close family members" above.

		services to be provided or works to be executed. • In addition, for each section – 3(a) to (e) you are asked to include details where it is proposed that that company or body enters into a contract with the relevant authority.	
3b	Details of any contract which is made between *(i) a firm in which I am (or my partner is) a partner and the relevant body/bodies at Section A of this form OR (ii) a member of my close family and the relevant body/bodies specified at Section A of this form under which (a) goods or services are to be provided or works are to be executed and (b) which has not been fully discharged.		• Note reference to ‘close family’.
3c	Details of any contract which is made between *(i) a body corporate of which I am (or my partner is) a <i>director</i> and the relevant body/bodies specified at Section A of this form OR (ii) a member of my close family and the relevant body/bodies specified at Section A of this form under which (a) goods or services are to be provided or works are to be executed and (b) which has not been fully		• Director includes a member of the committee of management of an industrial and provident society.

	discharged.		
3d	Details of any contract which is made between *(i) a firm or a body corporate in the <i>securities</i> of which I have (or my partner has) a beneficial interest and the relevant body/bodies specified at section A of this form OR (ii) a member of my close family and the relevant body/bodies specified at Section A of this form under which (a) goods or services are to be provided or works are to be executed and (b) which has not been fully discharged.		Securities” means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.
3e	Details of any contract which is made between (i) a firm in which I am (or my partner is) an employee and the relevant body/bodies at Section A of this form OR (ii) a member of my close family and the relevant body/bodies specified at Section A of this form under which (a) goods or services are to be provided or works are to be executed and (b) which has not been fully discharged.		
4	Details of any beneficial interest that I have, or my partner has in land within the geographical boundary of the relevant body/bodies specified at section A that entitles me or my partner to occupy (alone or jointly with another) that land, or to receive income from it.	this includes where: - you or your partner own(s), or own(s) a percentage of the freehold or long-term leasehold of a property (whether or not subject to a mortgage), - you or your partner	If your landlord has significant dealings with the GLA which directly related to your GLA role you should note this in box 11

		lease(s) land or property, on shorthold tenancies (for example, an assured shorthold tenancy), or - land or property is owned by a trust in which you have or your partner has an interest.] The following details should to be entered here: what the interest is, whether it is your or your partner's interest, the full address and postcode of the land and the London borough in which it is situated. If you consider this to be a Sensitive Interest, you should declare the full details in Section C and include the first part of the postcode of the land and the London borough in which it is situated (as minimum requirements).	
5	Details of any licence that entitles me or my partner (alone or jointly with others) to occupy land in the geographical boundary of the relevant body/bodies specified at section	Note: Details of the nature and length of the licence should be entered in this section, along with the postcode of the land, and the	• E.g. a garage or parking space

	A for a month or longer	London borough in which it is situated. If you consider this to be a Sensitive Interest, you should declare those details in Section C.	
6	Details of any tenancy where, to my knowledge, (a) a relevant body specified at Section A of this form is the landlord; and (b) the tenant is (i) a firm in which I am (or my partner is) a partner, (ii) a body corporate of which I am (or my partner is) a <i>director</i> , or (iii) (i) a firm or a body corporate in the <i>securities</i> of which I have (or my partner has) a beneficial interest.	Note: Details of the nature of and parties to the tenancy should be entered in this section, along with the full address of the property that is subject to the tenancy.	See guidance above for definitions of 'director' and 'securities'
7	Details of beneficial interest that I have or my partner has in the securities of a body where (a) that body (to my knowledge) has a place of business or land in the geographical boundary of the relevant body/bodies specified at section A; and (b) either (i) the total nominal value of the securities that I or my partner has exceeds £25,000 or one hundredth of the total issued share capital of that body; or (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which I or my partner has a beneficial interest exceeds one hundredth of the total issued share capital of that class.	Note: Details of the nature of the interest that you have or your partner has should be entered in this section, along with the name and full address of the body in whose securities that interest is held.	See guidance above for definition of 'securities'

8	Names and positions in non-profit making organisations with which a relevant body specified at Section A has dealings where I am or my partner is a trustee or participate(s) in management of that body and where not disclosed elsewhere in this form.		Examples could include: • Tenant/resident associations • Community groups • NGOs • Faith communities • Parent Teacher Associations • School governing bodies • School/Academy trusts • Leisure/parks trusts • Sports clubs and associations • Arts and cultural organisations • Housing Associations • If they are outside London, operate wholly outside London, and therefore outside the GLA's remit, you do not need to declare but err on the side of caution, and declare as soon as it becomes apparent that they have a connection with the GLA.
9	Any other office or position which I hold (including companies, trade associations and industry forums) and where not already disclosed elsewhere in this form		Examples could include: • Professional bodies, including regional groupings • Trade Unions/staff associations • On advisory groups for bodies operating in London • Magistrates • Visiting academic posts • NB only include in this section when holding a

			position of influence. Membership, e.g. of a professional body should be declared at Section 11. • Include involvement with companies but NOT directorships which are in section below.
10	Any other directorships of companies which I hold, whether paid or not, and where not already disclosed elsewhere on this form		Examples could include: • Directorships of GLA companies • Directorships of non-GLA companies which the GLA is a part-owner and/or member of (e.g. Regeneration companies) • Property management (e.g. where leaseholders collectively own the freehold of a block)
11	Significant Disclosable Interests: The following matter or interest not disclosed elsewhere in this Form that: • concerns me or someone who is a “Connected Person or Organisation”, and • might reasonably be perceived as involving, or being likely to involve, my work or role at the GLA or its wider functions and activities, and • is likely to: ○ affect or influence my conduct or actions in relationship to that work or role; or ○ impact or affect my or a Connected Person to a significant		A “Connected Person or Organisation” is: • a GLA employee’s spouse or civil partner or cohabitee (someone they are living as if they were their spouse or civil partner); • “close family members” of the GLA employee or their spouse/ civil partner/ cohabitee, defined as their: parents, grandparents, siblings, children, nieces or nephews; • personal friends of the employee or their spouse/civil partner/ cohabitee; • Other persons or organisations with a business relationship or some other significant business, social or personal connection to the GLA employee or their spouse/civil partner/ cohabitee.

	extent (either positively or negatively).		Examples could include: • Connected Persons (including close family members) holding positions that intersect with GLA work • Friends, business and social connections • Senior staff on secondment from other organisations • Membership of professional bodies • Freemasonry/Rotarians/other societies • Membership of political parties and political societies Include the nature of the matter/ interest concerned including the name of the Connected Person or Organisation and the nature of your relationship to the person with the interest/ matter.
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8 Sensitive Information

8.1 The presumption is that all information on interests should be in the public domain. However, where a relevant person considers that particular elements of the information could, if disclosed or published, lead to them or a person connected to them being subject to violence or intimidation, there is provision to complete a Sensitive Interests section to seek the Monitoring Officer's agreement that the interest is a sensitive interest, and should not be published.

8.2 With regard to keeping home addresses out of the public domain, if the Monitoring Officer agrees that it is a sensitive interest, the first part of the postcode of the land and the London borough in which it is situated (as minimum requirements) should be provided in the Register of Interest form (at box 4: land), and the full address will only appear in the Sensitive Pecuniary Interests section of the form.