

January 2004

Dear colleague,

CODE OF CONDUCT FOR EMPLOYEES

The Commission has now agreed a Code of Conduct for Staff. This is an important document, since it sets out the standards of behaviour the Commission expects of its staff. You should read it and if you do not understand how the Code applies to you, you should ask your line manager to go through it with you. In the future it will be part of the induction process, so all new staff will have it drawn to their attention when they start work.

The Code covers:

- x An introduction setting out how the **IPCC's Values** should be translated into the standards of behaviour expected from all its staff. It is a requirement for the IPCC to have such a code and in drawing it up we have looked at the standards that apply with the wider public sector and the police service.
- x **Diversity and Equal Opportunities** – the IPCC attaches high value to diversity and working to eliminate unlawful discrimination. The Code explains what this means for you.
- x **Identifying and Declaring a Conflict of Interest** - it is important to promote public confidence in the IPCC and this could be undermined if it appeared that any member of staff was able to be influenced inappropriately in the way in which they carried out their duties. This section gives guidance on:
 - o identifying what may be a conflict of interest for you
 - o completing the registration form for your personal file
 - o what to do if you are offered a gift or hospitality
 - o how what you do outside work could affect your job here
- x **Security and Confidentiality of Information** - the IPCC will collect a great deal of very sensitive information and the Code draws your attention to the responsibility you have to keep this confidential and our policies for Security and Data Protection. It also gives you guidance on what to do if you are contacted by the media.
- x **Concerns about Improper Conduct** - the Code also explains what you should do if you have a concern that illegal or improper activities may be going on in the

IPCC and how you should raise such concerns - this is sometimes called "Whistle blowing".

The Code has three forms attached to it:

1. Declaration of interests (staff other than Directors & CE) – your manager will help you fill this out. Once you have done so, you should forward a signed copy to Claire Stones in the Human Resources team who will place it on your personal file. The form will not be made public but you must keep it up to date.
2. Declaration of interests (CE and all Directors) – completed forms must be sent to HR (Claire Stones) for inclusion in personnel files and to the Commission Secretary for inclusion in the IPCC's public register.
3. Employee Gifts and Hospitality Registration form. The Code sets out rules for how you should respond to offers of gifts and hospitality. You need to be very careful about what you accept and in most cases you should not accept any gift or offer of hospitality. If you do, then you must complete a form.

If you have any queries on how the Code will operate, then please raise them initially with your line manager. Alternatively, the HR team will be happy to provide any help or advice on interpretation.

This is a new procedure and we will be monitoring its operation over the first year and reviewing the Code if necessary. If you have any comments, then please let me or your own Director know.

Yours sincerely,

Barry Simpson
Director of Corporate Services

CODE OF CONDUCT FOR EMPLOYEES

CONTENTS

- 1. Introduction - IPCC Values**
- 2. Purpose and Application of the Code of Conduct**
- 3. Standards of Behaviour Expected**
- 4. Accountability**
 - 4.1 Public Accountability
 - 4.2 Use of Resources
- 5. Diversity and Equal Opportunities**
- 6. Conflicts of Interests**
 - 6.1 Identifying Potential Conflicts of Interest
 - 6.2 Register of Interests
 - 6.3 Acceptance of Gifts & Hospitality
 - 6.4 Other Employment
 - 6.5 Conduct Outside Work
 - 6.6 Contact with the Police
 - 6.7 Political Activities
 - 6.8 Politically Restricted Posts
- 7. Access to Information**
 - 7.1 Dealing with the Media
- 8. Concerns about Improper Conduct & Whistleblowing**

1. INTRODUCTION - IPCC VALUES

The IPCC is a values-based organisation. People will work for it because they believe in what it is trying to do. Its core beliefs will be applied in its day to day work, reinforced through induction and training and articulated in actions and words by those who lead the organisation. We will apply these beliefs both to how the IPCC conducts its own affairs and in our relationships with others.

The Values set out in the IPCC's Vision Statement are:

- x Acting Justly and Respect for Human Rights
- x Independence
- x Diversity
- x Integrity
- x Openness

2. PURPOSE AND APPLICATION OF THE CODE OF CONDUCT

As an employee of the Independent Police Complaints Commission you must at all times observe the highest standards of **impartiality, integrity, objectivity and honesty** in relation to the work you undertake.

This Code of Conduct provides guidance to employees on how to ensure that their actions and behaviour are consistent with both the IPCC's values and the high standards of conduct required to maintain public confidence in the work of the IPCC.

- x You should familiarise yourself with the contents of the Code and act in accordance with the principles and the guidance set out in it.
- x You must comply with this Code. You must ensure that you understand your duties, rights and responsibilities, and are familiar with the functions and role of the IPCC and the IPCC's policies and procedures as it affects your job. New employees will be required to attend relevant training or induction courses to assist them in this.
- x Serious failure to comply with the Code of Conduct may be a disciplinary matter, so you should seek advice or guidance from your line manager, Director or the Human Resources department if you are in any doubt about how this Code applies to you.

Contractors, consultants or agency staff working with the IPCC will be expected to abide by the standards and principles set out in the Code and to seek advice from the appropriate Director or the Human Resources department when in doubt.

3. STANDARDS OF BEHAVIOUR EXPECTED

The Chief Executive has overall responsibility and is accountable to the Commission, for propriety in a broad sense, including conduct and discipline. She also has a duty to ensure that employees' rights are respected.

As an employee you have a right to:

- x Be spoken to politely
- x Be treated with respect
- x Be treated fairly and courteously by colleagues and those outside the organisation for whom we work
- x Be treated fairly in recruitment, training and promotion
- x Have your private life and commitments outside work respected
- x Have your point of view listened to and considered
- x Expect not to be harassed or intimidated at work and in particular have a right not to be harassed or intimidated because of their race, gender, colour, ethnic or national origin, religion, disability, marital status, age or sexuality
- x Speak out if you are the victim of bullying, harassment or intimidation and have your complaint taken seriously and properly investigated

As an employee you have a responsibility to:

- x Act professionally in your dealings with colleagues - treat colleagues as individuals and show sensitivity to their needs
- x Treat complainants, those investigated and other stake holders with fairness, courtesy and sensitivity to their needs and the situation they are in
- x Consider others in the exercise of your duties
- x Keep in mind the limitations of your own experience and value others' perspectives and experience

- x Express your point of view without being aggressive or overbearing
- x Listen to what others say and respect their point of view
- x Learn from your mistakes
- x Try to find solutions and work through disagreements with others
- x Take responsibility for your own learning and development
- x Take action if you witness or are made aware of any improper conduct, including any act of harassment or discrimination
- x Not to discriminate unlawfully, for example, in decisions you make
- x Not to put pressure on others to discriminate unlawfully
- x Challenge attitudes which demean or denigrate other people (individuals or groups) and develop self awareness of the impact of your own behaviour
- x Ensure that your behaviour (at work or outside) and your appearance at work whilst representing the IPCC does not cause embarrassment to the IPCC or reflect negatively on the IPCC in a way that would bring the reputation of the IPCC into disrepute or cause a loss of public confidence in its work

Use of Alcohol or illegal drugs

As an IPCC employee you cannot drink alcohol during your working hours (including during meal breaks) under any circumstances. This will also apply if you are on call and may be asked to go to an investigation at short notice.

Social events, e.g. leaving parties at which alcohol will be consumed should be arranged after work. If you attend a function during the working day at which alcohol is served you should not drink unless you have obtained permission from your Director in advance.

If you are at work under the influence of alcohol or illegal drugs, then that will be regarded by the IPCC as potentially a serious disciplinary matter. If you are prescribed drugs which may affect your ability to do your job, then you should seek advice from your line manager on the health and safety implications of this at the earliest opportunity.

4. ACCOUNTABILITY

Staff are accountable to the IPCC which is accountable to the Home Office (the sponsor department) as set out in the Management Statement and Financial Memorandum. The Home Secretary is the Minister responsible for the IPCC and is ultimately accountable to Parliament for its effectiveness and efficiency.

IPCC staff should conduct themselves with impartiality, integrity, objectivity and honesty. You should not deceive or knowingly mislead others, including other staff, the Commission, the sponsor department, Ministers, Parliament or the public

4.1 Public Accountability

Staff of public bodies (including IPCC staff) who deal with the affairs of the public should do so sympathetically, efficiently, promptly and without bias or maladministration. Staff of public bodies should offer the public the highest standards of conduct and service.

4.2 Use of Resources

Staff have a duty to ensure that the IPCC's resources are used in the most economical, efficient and effective manner as befits public money.

5. DIVERSITY & EQUAL OPPORTUNITIES

“Valuing diversity means making an organisation that is genuinely open to the creativity, insights and experience of people of different race, religion, ethnic origin, gender, sexuality, disability and other backgrounds amongst both our actual and potential staff and the individuals and organisations with whom we work. It means dealing with prejudice and discrimination where it exists and recognising that we have to work at it to obtain the benefits of diversity. We will act in accordance with the principles established by the Stephen Lawrence Inquiry which was a decisive influence on the formation of the IPCC. “

IPCC’s Values Statement (agreed November 2003)

IPCC wish to develop as a learning organisation in which knowledge and learning are shared amongst colleagues and improvement becomes endemic. With this in mind it is clearly important that colleagues are free to explore and discuss issues around diversity and difference. Nothing in this Code of Conduct should be interpreted as seeking to prevent or constrain such discussion.

However, it is unacceptable for employees to discriminate unlawfully – either in the decisions they make, or in putting pressure on another person to discriminate or in victimising someone who has raised an issue of potential discrimination in good faith and if you do so, you will face disciplinary action – and may even (if the facts of the individual case merit it) face dismissal.

In addition, the IPCC has a policy position on Diversity and Equal Opportunities, which goes further than the basic legal provisions, and breach of these policies may also be considered a disciplinary matter.

You are expected to understand the concept of institutional discrimination and institutional racism in particular and work to identify and eliminate it in the work of the IPCC and in relationships within the IPCC itself and with stakeholders.

The definition of institutional racism is:

The collective failure of an organisation to provide an appropriate and professional service to people because of their colour, culture or ethnic origin. It can be seen or detected in processes, attitudes and behaviour which amount to discrimination through unwitting prejudice, ignorance, thoughtlessness and racist stereotyping which disadvantage minority ethnic people.

Stephen Lawrence Inquiry

6. CONFLICTS OF INTEREST

The purpose of these provisions is to avoid any danger of any member of staff being influenced, or appearing to be influenced, by their private interests in the exercise of their public duties. It is not enough not to be influenced, public confidence in the IPCC might be shaken if a reasonable member of the public could perceive that an employee might be subject to improper influence as a result of the member of staff’s behaviour. You should not misuse your official position or information acquired in the course of your official duties to further your private interests or those of others.

6.1 Identifying Potential Conflicts of Interest

Senior Staff will be required to register all interests as set out below.

Other employees are required to discuss any areas of potential conflict with their line manager and register agreed areas of potential conflict.

In particular you should make known to your manager:

- x Any relative who is, or close personal friendship with, a police officer or anyone employed by a Chief Constable or a member of any body affiliated to or associated with overseeing the management of police forces in the England and Wales or seeking to influence the provision of police services in England and Wales.
- x If it comes to your knowledge that a complaint has come in from any person that you know personally or with whom you have a relationship
- x Any personal financial connection with any organisation or company seeking work from the IPCC
- x Any personal relationship with another employee of the IPCC, a Commissioner or anyone seeking work with the IPCC **IF** either of the two people concerned are asked to participate in any decision making process which affects the other person – (e.g. recruitment, appraisal, discipline, control of resources, etc.). The IPCC recognises that relationships and friendships will develop in the workplace and that most of these will give rise to no concern and are a private matter and the relationship need not be declared. You may not however put yourself in a position where you are selecting someone for a job or recommending a pay increase for someone with whom you have a close personal relationship and you must declare the relationship to your manager if these circumstances arise.

6.2 Registration of Interests

Chief Executive and Directors (including Regional Directors)

The Chief Executive and Directors (including Regional Directors) must declare their interests (with the exception of trade union membership and membership of a political party) in the same way as Commissioners do and the information will be available for public inspection on the same basis. In addition their posts are politically restricted (see below).

Other Employees

Other staff will also be required to declare personal or business interest which may, or may be *perceived* (by a reasonable member of the public) to influence their judgement using the attached form.

Employees who through the nature of their job have a direct influence on the Commission's decisions should declare all direct or indirect pecuniary and non-pecuniary interests. It also includes such interests of close family members and of people living in the same household.

Employees who do not in the course of their work make decisions on behalf of the IPCC or recommendations to the IPCC need not complete a full declaration form, although they must declare if they have any close family members or relatives in the police service or associated with the police services and if they are freemasons or members of a similar society.

Details of interests declared by employees should be kept up-to-date and will cover the same areas as those applying to Commissioners (with the exception of trade union

membership and political activities which are covered in 6.7 and 6.8 below). These details will be kept confidential and will not be available for public inspection.

Employees should not participate in the discussion or determination of matters in which they have an interest.

Definitions:

Indirect pecuniary interests arise from connections with bodies, 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.

Close family members include personal partners, parents, children (adult and minor), brothers, sisters and the personal partners of any of these.

6.3. Acceptance of Gifts and Hospitality

As an IPCC employee you should not use your official position to receive, agree to accept or attempt to obtain any payment or other consideration for doing, or not doing, anything or showing favour, or disfavour, to any person. You should not receive benefits of any kind from a third party, which might reasonably be seen to compromise your personal judgement and integrity.

Gifts

- x You must not accept any gifts in connection with your official duties, except in circumstances where the refusal to accept a gift is judged to cause unnecessary offence.
- x In these circumstances you must register receiving the gift and pass it onto the Commission Secretary, who will forward the gift to a charity designated by the IPCC.
- x In circumstances as outlined above, where the gift is kept, you must register receiving the gift and give an equivalent amount to the value of the gift to a charity designated by the IPCC.
- x You must not accept gifts in any circumstances, which are judged to have a value of £25 or more.

Hospitality

You may accept conventional hospitality provided it is normal and reasonable in the circumstances, for example:

- x Tea, coffee, biscuits and sandwiches at meetings
- x An invitation to an annual dinner of an organisation with which the IPCC has regular contact
- x A working lunch in the course of normal business provided this is not frequent, regular or lavish.

Any hospitality over £25 that is received by you as an IPCC employee in connection with your official duties must be registered on the attached form and submitted to the Commission Secretary.

Offers to attend purely social, artistic or sporting functions should be declined.

Under the Prevention of Corruption Act 1916, as an employee of a public body you may be required to prove that the receipt of payment or other consideration from someone seeming to obtain a contract is not corrupt.

6.4 Other Employment

All those who work for the IPCC are expected to observe the highest possible standards in both their professional and personal lives. Other employment must be declared.

If you are a Full-time employee, you are expected to be fully committed to the work of the IPCC and not to work for another employer and you must seek permission (which will not be unreasonably withheld) if you wish to take on other employment.

If you are not contracted to work full-time, you may take on other employment subject to there being no conflict of interest with your job at the IPCC. Each case will turn on a consideration of the member of staff's duties at the IPCC and the other employment and if you are in this situation, you should seek advice from your line manager at the earliest opportunity. Conflicts may arise, for example, if the other employer is likely to be investigated by the IPCC or is seeking a contract for goods or services with the IPCC.

6.5 Conduct Outside Work

Your **off-duty** time is your own, subject to the following:

- x **You must not bring the IPCC into disrepute, by doing or saying things that will reflect badly on the IPCC.** Membership of or the active participation in activities organised by groups or organisations whose values are inconsistent with the IPCC's (e.g. racist organisations) will create reasonable doubt in your ability to comply with the IPCC's values and this Code. In these circumstances you may be subject to a management investigation in accordance with the IPCC's Disciplinary Procedures. It is important that you seek advice from your line manager or the Head of HR in advance of taking part in any event which may fall into this category. You must also tell your line manager as soon as practicable if you inadvertently find yourself in a situation outside work which you had not anticipated and which you believe would cause embarrassment to the IPCC.
- x **You must not knowingly put yourself in a position where your private interests conflict with the IPCC's and any conflict of interest must be resolved in the IPCC's favour.** For example you should not knowingly attend a social event, at which a police officer being investigated is present, if by doing so you could be perceived by a reasonable member of the public as being open to personal influence in the way in which you do your job. If you do inadvertently attend such an event and find yourself in this situation, you must report it to your line manager.
- x You must not take on other business, employment or public duties without the permission of the IPCC
- x You must abide by the political restrictions set out below

Membership of the Freemasons and other "secret societies"

Any employee who is a member of the Freemasons or any other similar "secret society" must declare it.

A “secret society” is one where any lodge, chapter, society, trust or regular gathering or meeting which:

- (i) Is not open to members of the public who are not members of that lodge, chapter, society or trust
- (ii) Includes in the grant of membership an obligation on the part of the member or a requirement to make a commitment ,whether by oath or otherwise, of allegiance to the lodge, chapter, society, trust, gathering or meeting; and
- (iii) Includes, whether initially or subsequently, a commitment (whether by oath or otherwise) of secrecy about the rules, membership or conduct of the lodge, chapter, society, trust, gathering or meeting.

A lodge, chapter, society, trust or regular gathering or meeting as defined above should not be regarded as a secret society if it forms part of the activity of a generally recognised religion.

6.6 Contact with the Police

You must tell your line manager as soon as practicable if you or a close family member living at the same address as you

- x is arrested
- x receives a summons or
- x is the subject of a police investigation

You must immediately advise your Director of any criminal convictions, including any driving offences (including speeding, but excluding parking offences).

6.7 Political Activities

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

The IPCC is an independent body and needs to be seen to be acting impartially and public confidence might be affected if it was believed that an individual member of staff’s personal political views were compromising its independence and impartiality.

Employees whether in politically restricted posts or not may be members of a political party (and need not declare it). If you are not in a politically restricted post you may participate in political activities such as helping with administration at the time of a general election or delivering leaflets provided that you are conscious of the standards of behaviour expected of you as set out in this Code and exercise a proper discretion, particularly in regard to the work of the IPCC. On matters directly affecting the IPCC, you should not make political speeches or engage in other political activities.

If you wish to run for office, you must seek advice an at early stage from your Director/Head of Human Resources and it is likely that you will be required to take a leave of absence to do so.

6.8 Politically Restricted Posts

Posts at or above Grade E are politically restricted. This covers the posts of Chief Executive, all Directors, Heads of Service and Group Team Leaders.

In addition certain other posts may be politically restricted as determined by the Chief Executive. The Head of Human Resources will hold a list, so that this information can be included in contractual documentation and recruitment packs.

Posts which might be affected are:

- x Posts which act as “spokesperson” for the Commission or
 - x where the postholder has significant degree of face-to-face contact with stakeholders, pressure groups, or other bodies or individuals who are seeking to influence the IPCC
- AND**
- x Where it would appear to the public that the postholder had some influence over the outcome of the Commission's decisions.

If a post is Politically Restricted this means that:

- x postholders should not be politically active
- x they may not campaign for a political party,
- x hold political office
- x occupy party political posts or
- x hold particularly sensitive or high profile unpaid roles in a political party

If you are in a politically restricted post and another person resident at the same address as you is politically active, you need to ensure that your own political impartiality is not compromised and should seek advice if necessary from the Head of HR or the Chief Executive in such circumstances.

7. ACCESS TO INFORMATION

Our beliefs can only be demonstrated by openness. We will aim to provide regular and full information to all those involved in a complaint at all stages of our work subject to necessary sensitivity constraints.

We will define those occasions in which confidentiality or secrecy is required for operational reasons, to maintain the confidence of other agencies and to protect individuals. We will only be trusted with openness if there is complete trust in our ability to maintain confidentiality when required.

IPCC's Values Statement *(agreed November 2003)*

As an employee you must:

- x Follow IPCC policies in respect of complaint handling and security (including maintaining appropriate confidentiality)
- x Comply with the Data Protection Act and not use information obtained for one purpose for another
- x Keep confidential any personal data on individuals you collect and continue to keep this information confidential even after you leave the employment of the IPCC. You may only divulge this information if ordered to do so by a statutory body, Court of Law or as part of an official enquiry. In this context you may also divulge the information to any person acting as your legal representative.
- x Not use information gained in the course of your employment for unauthorised purposes

7.1 Writing/Speaking in Public and Responding to the Media

When writing or speaking publicly (either in a formal speech or informally at a meeting) on any matter which could be seen as falling within the remit of the IPCC, as an employee, you are likely to be seen as representing the IPCC or the IPCC's position on an issue, even when you may believe you are writing or speaking as a individual. Speeches or articles, which relate to IPCC work, should be cleared with the Director of Communications in advance.

You should not make direct contact with the media or respond to media enquiries unless it has been agreed in advance that they should do so. All media enquiries should be directed to the Communications section.

8. CONCERNS ABOUT IMPROPER CONDUCT

If you feel you are being asked to do something which you believe:

- x to be Illegal, improper or unethical
- x to be In breach of a professional code
- x may involve maladministration, fraud or misuse of public funds
- x is inconsistent with the Code

You should raise the matter in the first instance with your line management or if this is not possible or you are reluctant to do so, report the matter to the Director of Legal Services who has been nominated as the personal responsible for handling any employee's concerns about illegal, improper or unethical conduct. The Director of Legal Services will either investigate personally or arrange for another senior employee to do so. As far as is possible, confidentiality will be maintained.

Staff have a duty to draw attention to matters, even if not personally involved, where:

- x There is evidence of criminal or unlawful activity by others
- x They believe there is evidence of improper or unethical behaviour or the potential for maladministration

Employees should not investigate these matters themselves as this will give rise to an irresolvable conflict of interest. Provided that these matters are raised in good faith, any employee raising such matters will be supported.

8.1 "Whistleblowing" – Public Interest Disclosure Act 1998

The Act is intended to protect employees who report in good faith the wrongdoing of others. It allows employees to complain to an Employment Tribunal if they are dismissed or suffer detriment or victimisation for reporting the wrongdoing.

The legislation does not protect whistleblowers in all circumstances. A disclosure will be protected if you have good grounds for believing that one or more of the following has occurred or is likely to occur:

- x A criminal offence
- x A failure to comply with a legal obligation
- x A miscarriage of justice
- x The endangering of an individual's health and safety
- x Damage to the environment
- x Deliberate concealment of information relating to any of the above

Disclosures will be protected if the employee who makes the disclosure does so:

- x in good faith to the employer,
- x in accordance with the agreed procedure set out below,
- x reasonably believes the information and any allegation contained in it is substantially true and
- x does not act for personal gain or malice

IPCC Internal Whistle blowing Procedure

- x The matter should be raised with the employee's line manager in the first instance
- x If this is not possible it should be raised with the employee's Director
- x If this is not possible it may be raised with the Director of Legal Services

The Public Interest Disclosure Act also allows for matters to be raised externally. For staff of public bodies "protected disclosures" (which meet the above conditions) may be made to a Minister and in the case of the IPCC this would be the Home Secretary. The disclosure can be made directly or through departmental officials. Employees may seek their own legal advice or contact Public Concern at Work (www.pcaw.co.uk) which is a designated legal advice centre.

29 January 2004

CONFIDENTIAL

IPCC EMPLOYEE REGISTER OF INTERESTS FORM

DECLARATION OF EMPLOYEES' PERSONAL, FINANCIAL, BUSINESS AND OTHER INTERESTS

This form is intended to assist you to register your interests in accordance with the IPCC's Code of Conduct for Employees.

You should discuss any potential conflict of interest with your line manager and complete this form for inclusion on your personal file. The information on it will not be available publicly. The form states where all staff MUST make a declaration.

Staff who through the nature of their job have a direct influence on the Commission's decisions should declare all direct or indirect pecuniary and non-pecuniary interests (see note below) in accordance with the Code of Conduct for Employees. Staff who have access to sensitive information should also make a declaration.

Name:

1. Directorships of companies or organisations, whether remunerated directly or indirectly. Please provide a brief description of the business activities of the company or organisation:
2. Any other remunerated employment or activity (i.e. other than your post at the IPCC). If you have other employment you MUST declare it. Please provide the name of the organisations, trusts or other bodies of which you are a paid employee, partner or proprietor. You should also include fees from freelance work and appointments to any public body.

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.

A '**relative**' or 'close family member' is a partner, someone you are married to or live with as if you were married, a parent, a parent-in-law, a son or daughter, a stepson or stepdaughter, the child of a partner, a brother or sister, a grandparent, a grandchild, an uncle or aunt, a nephew or niece, or the husband, wife or partner of any of these people.

3. Details of any appointment to an office, whether paid or not, and/or membership of any club or other organisation of which you are a member. This should include any organisation associated with or affiliated to a police force in the UK. If you are a freemason or a member of a similar society you MUST declare it here.

4. Details of each fixed interest shareholding with a nominal value greater than £25,000 or 1% of the share capital held in:
 - x The sole name of employee
 - x Joint name, with spouse or close family member
 - x Sole name of spouse or partner
 - x A representative capacity , for example, as a trustee

5. Details of any relative or close family member who is a serving police officer, employed by a Chief Constable or a member or employee of any organisation which is affiliated to or which is seeking to influence police services in England and Wales? Please provide brief details (i.e. relationship to you /the position your relative holds). If this applies to you, you MUST declare it here.

6. Any other business, financial or personal interest relevant to the activities of the IPCC.

Signed:

Date:

IPCC REGISTER OF INTERESTS FORM (Chief Executive & Directors)

DECLARATION OF PERSONAL, FINANCIAL, BUSINESS AND OTHER INTERESTS

This form is intended to assist you to register your interests in accordance with the IPCC’s Code of Conduct for Employees. The Commission have decided that the Chief Executive and all Directors are required to publicly declare all direct or indirect pecuniary and non-pecuniary interests (see note below) in accordance with the Code of Conduct For Employees

When you have completed the form, a copy should be given to the HR Team for inclusion on your personal file and to the Commission Secretary for inclusion in the published IPCC Register of Interests where it will be available for public inspection alongside similar declarations from the Commissioners.

<p>Name:</p> <p>Position:</p>

- 4. Directorships of companies or organisations, whether remunerated directly or indirectly. Please provide a brief description of the business activities of the company or organisation:

- 5. Any other remunerated employment or activity (i.e. other than your post at the IPCC). If you have other employment you MUST declare it. Please provide the name of the organisations, trusts or other bodies of which you are a paid employee, partner or proprietor. You should also include fees from freelance work and appointments to any public body.

<p>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.</p> <p>Non-pecuniary interests include those arising from membership of clubs and other organisations.</p> <p>A ‘relative’ or ‘close family member is a partner, someone you are married to or live with as if you were married, a parent, a parent-in-law, a son or daughter, a stepson or stepdaughter, the child of a partner, a brother or sister, a grandparent, a grandchild, an uncle or aunt, a nephew or niece, or the husband, wife or partner of any of these people.</p>
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6. Details of any appointment to office(s), whether paid or not, and/or membership of any club or other organisation of which you are a member. This should include any organisation associated with or affiliated to a police force in the UK. If you are a freemason or a member of a similar society you MUST declare it here.

7. Details of each fixed interest shareholding with a nominal value greater than £25,000 or 1% of the share capital held in:

- x The sole name of Commission member
- x Joint name, with spouse or close family member
- x Sole name of spouse or partner
- x A representative capacity , for example, as a trustee

8. Details of any relative or close family member who is a serving police officer, employed by a Chief Constable or a member or employee of any organisation which is affiliated to or which is seeking to influence police services in England and Wales? Please provide brief details (i.e. relationship to you /the position your relative holds). If this applies to you, you MUST declare it here.

9. Any other business, financial or personal interest relevant to the activities of the IPCC

Signed:

Date:

INDEPENDENT POLICE COMPLAINTS COMMISSION

EMPLOYEE GIFTS AND HOSPITALITY REGISTRATION FORM

NAME	
NAME OF ORGANISATION OR INDIVIDUAL PROVIDING GIFT OR HOSPITALITY¹	
DETAILS, INCLUDING VALUE, OF GIFT OR HOSPITALITY	
DATE RECEIVED	
NOTE ON WHAT HAS BEEN DONE WITH GIFT (where appropriate)²	
EMPLOYEE SIGNATURE	
DATE FORM COMPLETED	
DATE RECORDED IN REGISTER BY COMMISSION SECRETARY	

Please return completed forms to the Commission Secretary, IPCC, 90 High Holborn, WC1 6BH

¹ All hospitality judged to be over £25 must be registered

² Accepted gifts must either be handed to the Commission Secretary or if to be kept, a cheque for the judged value of the gift made payable to the designated charity given to the Commission Secretary