

**By:** Roger Gough – Cabinet Member, Corporate Support Services and Performance Management  
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**To:** Personnel Committee

**Date:** 27 January 2010

**Subject:** Officer Code of Conduct

**Classification:** **Unrestricted**

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**SUMMARY:** This report is brought to Personnel Committee at the request of Cabinet Scrutiny Committee. Personnel Committee is invited to consider whether the Officer Code of Conduct is sufficiently robust in relation to declaration of interests which may be perceived by members of the public as in conflict with their responsibilities. The Committee is invited to consider this in comparison with the member code of conduct.

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1. **BACKGROUND**

The current officers' code was agreed by Personnel Committee in 2008 following a comprehensive review of its content. The Code was drafted in the Personnel and Development Employment Policy team. The Monitoring Officer, together with procurement and audit managers, reviewed and approved the final document which, on their advice, was further amended to clarify and strengthen specific elements, particularly those concerning transparency; relationships with contractors; procurement; sponsorship; gifts and hospitality.

2. **THE CODE OF CONDUCT**

- 2.1 The Officer code of conduct is attached at Appendix 1.
- 2.2 The Code is prefaced with the statement about public expectation of officer integrity which is reflected and reinforced throughout the Code - an expectation at least equivalent to s.10 (1) of the Member Code of Conduct relating to prejudicial interest. The requirement to declare potential and actual conflicts of interest in the name of transparency is also clear throughout as is officers' accountability to the Kent public.
- 2.3 Declared conflicts of interest are held on a centrally-held register which can be accessed by request (e.g., FOI).
- 2.4 As such there is no discrepancy between the Member and Officer Codes, save the language since both compel individuals to heed the public (prejudicial) interest test in their professional or political duties.

3. **RECOMMENDATION**

The Committee is asked to consider whether they wish to instigate a formal review of the officer code of conduct.

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