AUDIT AND GOVERNANCE COMMITTEE

Report subject	**Annual Review of Declarations of Interests, Gifts & Hospitality by Officers 2025/26**
Meeting date	30 July 2026
Status	Public Report
Executive summary	An annual review of the Council's Declaration of Interests, Gifts and Hospitality Policy (for officers) was undertaken in February 2026, and the revised Policy was approved by the Audit & Governance Committee on 26 February 2026. The key changes introduced were: • Strengthened requirements for declaring other employment, including additional guidance, a formal definition, updates to forms, the flowchart and FAQs. • Clarified line manager responsibilities for assessing declarations and documenting decisions. Added requirement to submit completed forms to Service Directors. • Enhanced Service Director oversight, including review of declarations, validation of line manager decisions, communication of outcomes and completion of a dedicated review section. During 2025/26, awareness of the Declaration of Interests, Gifts and Hospitality Policy was promoted through corporate and targeted communications, induction and mandatory training for new employees, and bespoke training sessions delivered across Council services by the Head of Audit & Management Assurance. The Head of Audit & Management Assurance considers the Declaration of Interests, Gifts and Hospitality Policy to be fit for purpose, with generally good levels of awareness and compliance across the workforce. This assessment reflects the fact that only a small number of reminders were required by Internal Audit to obtain declarations from newly appointed senior officers.
Recommendations	**It is RECOMMENDED that:** **1. Audit & Governance Committee note the annual review of Declarations of Interests, Gifts & Hospitality by Officers (2025/26).** **2. Note the opinion of the Head of Audit & Management Assurance that the Policy is fit for purpose and that there was a good level of awareness and compliance in 2025/26.**

Reason for recommendations	To provide Audit & Governance Committee with assurance on the adequacy and robustness of the Council's arrangements for the declaration of interests, gifts and hospitality by officers.
Portfolio Holder(s):	Cllr Mike Cox, Portfolio Holder for Finance
Corporate Director	Aidan Dunn, Chief Executive
Report Authors	Nigel Stannard Head of Audit & Management Assurance 🖃 nigel.stannard@bcpcouncil.gov.uk ☎01202 128784
Wards	Council-wide
Classification	For Information

Background

1. A new BCP Council Declaration of Interests, Gifts and Hospitality Policy (for officers) was introduced on 1 April 2020 and has thereafter been subject to annual evolutionary changes. Officers are responsible for maintaining their declarations in as near to real-time as is practical.

2. The purpose of the Policy is to protect the Council and employees against conflicts of interest and allegations of impropriety. The public must be confident that decisions made by employees of whatever nature are made in the interests of BCP Council and the community it serves and are not influenced inappropriately by the interests of individual employees, their relatives or friends.

3. The Policy is a key building block where the Council and employees can demonstrably show awareness and compliance with the Nolan Principles, the seven principles of public life, namely selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

4. This report aims to provide Audit & Governance Committee with assurance on the adequacy and robustness of the Council's arrangements for the declaration of interests, gifts and hospitality by officers.

Annual Review of BCP Declaration of Interests, Gifts and Hospitality Policy

5. An annual review of the Council's Declaration of Interests, Gifts and Hospitality Policy was undertaken in February 2026, and the revised Policy was approved by the Audit & Governance Committee on 26 February 2026

6. Some changes were made to the policy as part of the annual evolution as summarised below:

   - Other Employment (additional guidance to ensure declarations always made)
     - Added 'other employment' as specific need to declare item.
     - Added extra guidance in relation to other employment.
     - Other employment definition added to Appendix A.
     - Added extra step in relation to 'other employment' to Declarations of Interest Flowchart Appendix B.
     - Added 'other employment' reference in Part B (approving manager section) in Forms 1 and 2.
     - Added 'other employment' as additional FAQ under Appendix E.

- Line Manager Responsibilities
    - Defined the responsibilities of Line Managers in assessing declarations made by employees and deciding if the risk to the Council and the employee is acceptable (or not) and documenting the outcome.
    - Added requirement to pass all completed Form 1's to their Service Director.
- Service Director Responsibilities
    - Added requirement to receive all declarations made and determine if decisions taken by line managers are appropriate and document the outcome.
    - Added requirement to notify employee of decision and ensure they receive a copy of the completed form.
    - Added Service Director's review section in Form 1.
- General
    - Added further guidance on declaration form process.

7. A corporate communication on the updated Declaration of Interests, Gifts and Hospitality Policy along with other Finance Policies was issued to all staff, including a separate message to senior managers in April 2026.

8. A further targeted communication was issued to Service Directors in June 2026, reminding them of their new responsibility to review all declarations submitted, determine whether decisions made by line managers were appropriate, and record the outcome on the declaration form.

9. Policy awareness for new employees is ensured through the formal induction process and the completion of mandatory training (in particular the Fraud Awareness module).

10. The Head of Audit & Management Assurance has continued to deliver bespoke training and question and answer sessions on the Policy across Council services during 2025/26.

Internal Audit work on Declaration of Interests, Gifts and Hospitality

11. Internal Audit undertook an annual exercise to confirm that all Tier 4 and above officers had completed and submitted a Form 2, as required by the Declaration of Interests, Gifts and Hospitality Policy. Following a small number of reminders, it was confirmed that 100% of senior officers had completed and returned their forms to the Monitoring Officer in accordance with the Policy. As in previous years, those requiring reminders were predominantly officers who were either new to the organisation or newly appointed to a senior officer role (Tier 4 and above).

12. A review of compliance with the Declarations of Interests, Gifts and Hospitality Policy by officers below Tier 4 is included in the 2026/27 Internal Audit Plan. The findings will be reported to the Committee as part of the next annual update in July 2027.

13. Internal Audit reviews data-matching results provided through the National Fraud Initiative(NFI)*, which identify matches between BCP Council payroll records and other NFI participant's payroll records, Companies House directorships and, where applicable, payments made to those companies. This review is undertaken on a biennial basis, with the next set of data-matching results scheduled for release in January 2027. The outcome of this review will be reported to the Committee as part of the next annual update in July 2027.
**Councils must participate in the NFI.*

Declaration of Interests, Gifts and Hospitality Policy Enforcement and Sanctions

14. Employees must comply with the requirements of the Policy and any failure to do so is a disciplinary matter. Disciplinary action may be taken regardless of whether the actions amount to a criminal offence.

15. There were no identified internal or external incidents, whistleblowing disclosures, or reports received through any other channels indicating that undeclared interests, gifts, or hospitality resulted in disciplinary action during 2025/26.

Overall Opinion for 2025/26

16. The Head of Audit & Management Assurance considers the Declarations of Interests, Gifts and Hospitality Policy to be fit for purpose, with generally good levels of awareness and compliance across the workforce. This assessment reflects the fact that only a small number of reminders were required by Internal Audit to obtain declarations from newly appointed senior officers.

Options Appraisal

17. An options appraisal is not applicable for this report.

Summary of Financial Implications

18. There are no direct financial implications from this report.

Summary of Legal Implications

19. The Bribery Act 2010 makes it an offence for an employee to give advantage to someone in return for favours in relation to the Council's business.

20. Section 117 of the Local Government Act 1972 requires that employees notify the authority in writing of any direct or indirect financial interests which they have in any Council contracts, or proposed contracts, of which they become aware. Breach of Section 117 is a criminal offence subject to a fine.

Summary of Human Resource Implications

21. There are no direct human resource implications from this report.

Summary of Environmental Impact

22. There are no direct environmental implications from this report.

Summary of Public Health Implications

23. There are no direct public health implications from this report.

Summary of Equality Implications

24. There are no direct equality implications from this report.

Summary of Risk Assessment

25. There are no direct risk management implications from this report.

Background Papers

None

Appendices

None