

## REGISTERING YOUR INTERESTS

You must declare and register your interests. This is to ensure that there can be no suggestion of bias or the use of an official position to further personal interests. Colleagues in Bands A-C should only register information where they or close family members have official dealings with the organisation and there is potential for a conflict of interest to arise. Senior civil servants are required to register all of the following:

- business interests (including directorships), not only personal, but also of close family members
- shareholdings or other securities/financial interests which you or members of your close family hold – where these are trusts, for example PEP, ISA, only the holding organisation needs to be declared. Senior civil servants aren't required to register cash ISAs
- any other financial interest where there is the potential for a conflict of interest to arise as a result of your official position (excluding bank and mortgage providers)
- private interests in organisations where there could be the potential for a conflict of interest to arise, for example membership of clubs, societies and other organisations

From time to time, your senior management, in consultation with HR policy colleagues, may issue additional guidance tailored to your business area.

### Disciplinary action and prosecution

Where a conflict does arise and the interest has not been recorded on the eHR system and discussed with your manager, disciplinary action may be taken. You may be subject to criminal prosecution if you act corruptly. Disciplinary action may also be taken regardless of, and in parallel to, criminal proceedings.

### Managing a potential conflict of interest

You should raise any potential conflicts of interest with your manager. Colleagues in Band A-C can raise any queries via HR Online selecting 'other' in the dropdown menu. Senior civil servants should copy in the senior staff team.

There are a range of actions that could be taken, including but not limited to:

- delegating the affected colleague's responsibilities to another
- declaring any relevant interests at all meetings to which the interest relates
- recording potential conflicts in the minutes of meetings
- excluding the affected colleague from meetings (or parts of meetings) which discuss matters related to their interests
- moving to another post in the Scottish Government where the conflict would not arise
- disposing of the interest

You should agree appropriate actions with your manager in writing, inform your director (or your director general for senior civil servants) and record them on the eHR system. You must ensure they are complied with at all times.

### **How to register**

You should register your interests on the [eHR system](#) by following these steps:  
Employee Self Service > Case Management – Employee > Register of Interests  
Senior civil servants should also discuss and record potential propriety or conflict of interest issues as part of their mid-year and end-year performance appraisals.

### **Definition of close family members**

Close family members means family members who may be expected to influence, or be influenced by, you. Examples may include domestic partner and children, children of domestic partner, dependants or dependants of domestic partner.

## Extract from SCS performance management guidance :

### Conflict of interest

Senior Civil Servants must discuss and record any conflict of interest issues as part of their mid-year and end-year performance appraisals.

You must tick the box on your performance management form to confirm this discussion has taken place.