

For General Release

REPORT TO:	ETHICS COMMITTEE 20th NOVEMBER 2013
AGENDA ITEM NO:	8
SUBJECT:	CODE OF CONDUCT & REGISTER OF MEMBERS INTERESTS
LEAD OFFICER:	COUNCIL SOLICITOR, DIRECTOR OF DEMOCRATIC AND LEGAL SERVICES & MONITORING OFFICER
WARDS:	ALL
CORPORATE PRIORITY/POLICY CONTEXT: The Council has determined that the Ethics Committee shall be responsible for receiving reports from the Monitoring Officer on matters of probity and ethics for consideration.	
FINANCIAL IMPACT Implementation of the recommendations contained in this report shall be contained within existing budgets	
FORWARD PLAN KEY DECISION REFERENCE NO.: N/A	

1. RECOMMENDATIONS

The Committee is asked to:

- 1.1 Consider and note the contents of the report; and
- 1.2 Recommend to Council that the revisions to the Code of Conduct as set out in Appendix D and Register of Interests form at Appendix F be approved for use of Members following the local elections in 2014.
- 1.3 Approve the approach to removal of current Members' registers of interest from the Council's website and confidential disposal thereof, following the local elections in 2014, with the exclusion of non-Councillor Members of the Health and Wellbeing Board who's Registers of Interest will remain on the Council's website for the duration of the term of their appointment.

2. EXECUTIVE SUMMARY

- 2.1 Members will be aware that the current Code of Conduct and Register were approved following legislative changes introduced by the Localism Act 2011 and on 2 July 2012 full Council adopted a number of measures to comply with the new legislation including adopting a Code of Conduct for Members and a form of Register of Interests which each Member was required to complete.

- 2.2 The report requests Committee's guidance on proposed amendments to the Code of Conduct and Register of Interests which, if approved will be recommended to full Council for adoption.

3. DETAIL

Code of Conduct:

- 3.1 The Council is required by the provisions of the Localism Act 2011 to 'promote and maintain high standards of conduct' by their Members by the adoption of a Code of Conduct for elected Members including voting co-optees. Whilst the content, beyond the requirements around disclosable pecuniary interests (DPIs), is at the discretion of the Council, there are 7 principles identified within the Act which are required to be taken into account. These 7 principles are: selflessness, integrity, objectivity, accountability, openness, honesty and leadership. These are the former Nolan Principles. The legislation did not describe the characteristics encompassed within the principles but simply named them.
- 3.2 Having regard to those requirements, the Council adopted a light touch Code which required registration of the DPI's and in relation to other personal interests, the Council determined that Members would also be required to declare any gifts and hospitality they received which exceeded the value of £50. In taking the 7 principles into account, the Council broadly included the descriptions attributed to those principles by the Committee for Standards in Public Life which appear within section 2 of the Council's Code of Conduct at paragraphs (i) – (vii) but adapted these specifically for Croydon and in line with the Council's views.
- 3.3 Since the adoption of the Code of Conduct, the Committee for Standards in Public Life has revised the descriptions which they consider accord with the 7 principles. The legislation did not specify descriptions attributed to the principles as being required to be adopted within the Council's Code of Conduct therefore it is a matter for the Committee to consider as to whether the descriptions which appear within Croydon's Code are retained or whether the Code is updated to reflect the new descriptions with the Committee for Standards in Public Life have now adopted.
- 3.4 A table of the new descriptions is set out at Appendix A. The former descriptions are set out in Appendix B and the wording of the Council's current Code of Conduct appear at Appendix C for purposes of comparison.
- 3.5 In a number of respects, the descriptions adopted by the Committee on Standards in Public Life, which do not have statutory force, are wider and more onerous in terms of the expectations on holders of public office than the current requirements within the Localism Act 2011 and the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012 which are the legislative provisions that the Council and Members need to comply with. In addition, some wording has been shifted between the descriptions of the principles so that characteristics which previously appeared as part of the description for one principle now appear, slightly reworded, in relation to another principle.

- 3.6 For example, in the new description of integrity, a requirement is placed on the holder of public office to declare and “resolve any interests and relationships”. This is a rewording of the description which previously appeared under honesty. The predominant difference is that whereas the previous description placed an expectation on the holder of public office to resolve any conflicts arising in a way that protects the public interest, the new description requires resolution of interests or relationships which a Member may not even be required by legislation to declare. In addition, it is less precise as to when such an obligation arises because it does not require that there even be a conflict between such interests or relationships before an expectation is placed on the holder of public office.
- 3.7 A further example in relation to the new description of integrity is the requirement for holders of public office to avoid placing themselves under any obligation to people or organisations that might try to inappropriately to influence them “in their work”. This is in contrast to the previous description which specifically linked the requirement to “official duties” which is much narrower and ties in with the case law in terms of moving away from attempting to regulate holders of public office in their private or personal capacity and seeking only to deal with their official capacity in public office. Neither of these examples, if implemented, are considered to enhance transparency but appear confusing and more onerous than the Croydon Code as adopted.
- 3.8 In light of the above examples and comments, it is considered that, there are only a few additions and clarifications which are recommended to the Committee for inclusion within the Code:
- 3.8.1 The inclusion that any influence from outside bodies should be exerted “inappropriately” and it is recommended that, even if the new descriptions are not adopted, this aspect is specifically included within Croydon’s Code of Conduct at paragraph 2(ii);
- 3.8.2 The inclusion within the description of objectivity that decisions should be taken without discrimination or bias. This is already a legal requirement and good practice for all Council Decisions however the Committee may wish to underscore this expectation by including “and without discrimination or bias” within paragraph 2(iii) of Croydon’s Code of Conduct.
- 3.8.3 That specific reference be made to the fact that the Code applies to Health and Wellbeing Board Members.
- 3.9 A draft Code of Conduct, taking the recommendations above into account, is attached at Appendix D for Members’ consideration and approval. It is proposed to retain all Croydon specific provisions which were originally adopted in the Code of Conduct. The proposed amendments appear underlined and in italics in the text of the Code.

Register of Interests:

- 3.10 Members will recall that the current Register of Members interests, copy attached for ease of reference at Appendix E makes a distinction between those interests which the Member has and those which relate to their partner/spouse. Although each Member is required to register both their interests and those of their partner/spouse, a number of London Boroughs have not made a distinction between those interests of the Member and those of their partner/spouse. It is proposed that Croydon streamlines its form of Register so that these interests are no longer set out separately. In addition, it is proposed that the guidance notes for completion of the Register of Interests be updated.
- 3.11 The amended Register of Interests form is appended at Appendix F for Member's consideration and approval.
- 3.12 Currently, as is required by the Localism Act, the Members' Register of Interests appears on the Council's website. This continues to be a requirement placed on the Council that such registers are published online. As part of the process of ensuring that the Registers are up to date and accurate, it is proposed that the Registers of Interests for current Members be removed from the Council's website following the local elections in 2014. It is not proposed that the Council retains the Register of Interests for any Members for their previous term of office and these will be disposed of confidentially or returned to the Member concerned when new Members are elected. Each Member elected to office will be required to complete a new Register of Interests form within 28 days of being elected. Only this new register will appear on the Council's website.
- 3.13 The proposals set out in the previous paragraph will not apply to non-Councillor Members of the Health and Wellbeing Board because, although they are regarded as Members of the Council for purposes of complying with the Code of Conduct and registering their interests, their term of appointment is not dependant on local elections. As such the Health and Wellbeing Board members, excluding those who are also Council Members, will be retained on the Council's website for the duration of their appointment to the Board.

4. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 4.1 There are no direct financial or other implications arising from this report.

CONTACT OFFICERS:

Julie Belvir, Council Solicitor, Director of Democratic and Legal Services and Monitoring Officer (ext 64985)

BACKGROUND DOCUMENTS:

None

<i>Selflessness</i>	Holders of public office should act solely in terms of the public interest.
<i>Integrity</i>	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.
<i>Objectivity</i>	Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.
<i>Accountability</i>	Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.
<i>Openness</i>	Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.
<i>Honesty</i>	Holders of public office should be truthful.
<i>Leadership</i>	Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.

SELFLESSNESS: Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

INTEGRITY: Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

OBJECTIVITY: In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

ACCOUNTABILITY: Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

OPENNESS: Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

HONESTY: Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

LEADERSHIP: Holders of public office should promote and support these principles by leadership and example.

CODE OF CONDUCT

1. You are a member or co-opted member of the London Borough of Croydon and as such you shall have regard to the following principles – selflessness, integrity, objectivity, accountability, openness, honesty, leadership and undertake to observe this Code when acting in your capacity as a member or co-opted member.
2. When acting in your capacity as a member or co-opted member:-
 - i) You must act solely in the public interest and should never improperly confer an advantage or disadvantage on any person or act to gain financial or other material benefits for yourself, your family, a friend or close associate.
 - ii) You must not place yourself under a financial or other obligation to outside individuals or organisations that might seek to influence you in the performance of your official duties.
 - iii) When carrying out your public duties you must make all choices, such as making public appointments, determining applications, awarding contracts or recommending individuals for rewards or benefits, on merit.
 - iv) You are accountable for your decisions to the public and you must co-operate fully with whatever scrutiny is appropriate to your office as determined by the Council.
 - v) You must be as open as possible about your decisions and actions and the decisions and actions of your authority and should be prepared to give reasons for those decisions and actions.
 - vi) You must declare any private interests, both pecuniary and non-pecuniary, which relate to your public duties and must take steps to resolve any conflicts arising in a way that protects the public interest. This means you must register and declare the interests set out in paragraph 3 below, in a manner conforming with the procedures set out therein.
 - vii) You must, when using or authorising the use by others of the resources of your authority, ensure that such resources are not used improperly for political purposes (including party political purposes) and you must have regard to any applicable Local Authority Code of Publicity made under the Local Government Act 1986.
 - viii) You must promote and support high standards of conduct when serving in your public post, in particular as characterised by the above requirements, by leadership and example, including not doing anything which breaches the equalities legislation and observing the Council's Protocol on Staff-Councillor Relations.

3. Registering and disclosing pecuniary and non-pecuniary interests

- i) You must, within 28 days of taking office as a member or co-opted member, notify the Council's Monitoring Officer of any disclosable pecuniary interest as defined by regulations made by the Secretary of State, where the pecuniary interest is yours, your spouse's or civil partner's or is the pecuniary interest of somebody with whom you are living with as a husband or wife, or as if you were civil partners.
- ii) In addition, you must, within 28 days of taking office as a member or co-opted member, notify your authority's Monitoring Officer or any disclosable pecuniary or non-pecuniary interest which the Council has decided should be included in the register. For these purposes the Council has determined that you will disclose any gift(s) or hospitality the value of which exceeds £50.
- iii) If an interest described in (i) above has not been entered onto the Council's register, or is not pending inclusion on the register following your notification to the Monitoring Officer then you must disclose the interest to any meeting of the Council at which you are present, where you have a disclosable interest in any matter being considered and where the matter is not a 'sensitive interest'.¹
- iv) Following any disclosure of an interest not on the Council's register or the subject of pending notification, you must notify the Monitoring Officer of the interest within 28 days beginning with the date of disclosure.
- v) Unless a dispensation has been granted, you may not participate in any discussion of, vote on or discharge any function related to any matter in which you have a disclosable pecuniary interest as defined by regulations made by the Secretary of State. Additionally, you must observe the restrictions the Council places on your involvement in matters where you have a pecuniary or non-pecuniary interest as defined by the Council.

¹ A 'sensitive interest' is described in the Localism Act 2011 as a member or co-opted member of an authority having an interest, and the nature of the interest being such that the member or co-opted member, and the authority's Monitoring Officer, consider that disclosure of the details of the interest could lead to the member or co-opted member, or a person connected with the member or co-opted member, being subject to violence or intimidation.

DRAFT REVISED CODE OF CONDUCT

4. You are a member or co-opted member of the London Borough of Croydon or a Member of the Health and Wellbeing Board and as such you shall have regard to the following principles – selflessness, integrity, objectivity, accountability, openness, honesty, leadership and undertake to observe this Code when acting in your capacity as a member or co-opted member.
5. When acting in your capacity as a member or co-opted member:-
 - i) You must act solely in the public interest and should never improperly confer an advantage or disadvantage on any person or act to gain financial or other material benefits for yourself, your family, a friend or close associate.
 - ii) You must not place yourself under a financial or other obligation to outside individuals or organisations that might seek to influence you inappropriately in the performance of your official duties.
 - iii) When carrying out your public duties you must make all choices, such as making public appointments, determining applications, awarding contracts or recommending individuals for rewards or benefits, on merit without discrimination or bias.
 - iv) You are accountable for your decisions to the public and you must co-operate fully with whatever scrutiny is appropriate to your office as determined by the Council.
 - v) You must be as open as possible about your decisions and actions and the decisions and actions of your authority and should be prepared to give reasons for those decisions and actions.
 - vi) You must declare any private interests, both pecuniary and non-pecuniary, which relate to your public duties and must take steps to resolve any conflicts arising in a way that protects the public interest. This means you must register and declare the interests set out in paragraph 3 below, in a manner conforming with the procedures set out therein.
 - vii) You must, when using or authorising the use by others of the resources of your authority, ensure that such resources are not used improperly for political purposes (including party political purposes) and you must have regard to any applicable Local Authority Code of Publicity made under the Local Government Act 1986.
 - viii) You must promote and support high standards of conduct when serving in your public post, in particular as characterised by the above requirements, by leadership and example, including not doing anything which breaches the equalities legislation and observing the Council's Protocol on Staff-Councillor Relations.

6. Registering and disclosing pecuniary and non-pecuniary interests

- i) You must, within 28 days of taking office as a member or co-opted member, notify the Council's Monitoring Officer of any disclosable pecuniary interest as defined by regulations made by the Secretary of State, where the pecuniary interest is yours, your spouse's or civil partner's or is the pecuniary interest of somebody with whom you are living with as a husband or wife, or as if you were civil partners.
- ii) In addition, you must, within 28 days of taking office as a member or co-opted member, notify your authority's Monitoring Officer or any disclosable pecuniary or non-pecuniary interest which the Council has decided should be included in the register. For these purposes the Council has determined that you will disclose any gift(s) or hospitality the value of which exceeds £50.
- iii) If an interest described in (i) above has not been entered onto the Council's register, or is not pending inclusion on the register following your notification to the Monitoring Officer then you must disclose the interest to any meeting of the Council at which you are present, where you have a disclosable interest in any matter being considered and where the matter is not a 'sensitive interest'.²
- iv) Following any disclosure of an interest not on the Council's register or the subject of pending notification, you must notify the Monitoring Officer of the interest within 28 days beginning with the date of disclosure.
- v) Unless a dispensation has been granted, you may not participate in any discussion of, vote on or discharge any function related to any matter in which you have a disclosable pecuniary interest as defined by regulations made by the Secretary of State. Additionally, you must observe the restrictions the Council places on your involvement in matters where you have a pecuniary or non-pecuniary interest as defined by the Council.

² A 'sensitive interest' is described in the Localism Act 2011 as a member or co-opted member of an authority having an interest, and the nature of the interest being such that the member or co-opted member, and the authority's Monitoring Officer, consider that disclosure of the details of the interest could lead to the member or co-opted member, or a person connected with the member or co-opted member, being subject to violence or intimidation.

London Borough of Croydon

Register of Members' Interests under Section 29 of the Localism Act 2011 and the Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012

Notification by Member of a Local Authority of Disclosable Pecuniary Interests

Please notify the Council Solicitor and Monitoring Officer of any changes to any of this information, in writing to (julie.belvir@croydon.gov.uk), within 28 days of the change.

Name of Member

Date of appointment to office

I hereby give notice that I have the following disclosable pecuniary interests (please state 'None' where not applicable).

Note: Members are only required to declare those interests of their Partner of which they are aware.

For the purposes of this register:

“Body in which the relevant person has a beneficial interest” means a firm in which the relevant person is a partner, or a body corporate of which the relevant person is a director in the securities of which the relevant person has a beneficial interest.

“Director” includes a member of the committee of management of an industrial and provident society.

“Land” excludes an easement, servitude, interest or right in or over land which does not carry with it a right for the relevant person (alone or jointly with another) to occupy the land or to receive income.

“Partner” means your spouse, civil partner, person with whom you live as husband and wife or person with whom you live as if you are civil partners. (Section 30(3)(b) of the Localism Act 2011).

“Relevant person” means you as a Member or co-opted Member or any other person referred to in Section 30(3)(b) of the Localism Act 2011. That section of the Localism Act prescribes that this includes your partner as defined below.

“Relevant period” means the period of 12 months ending with the day on which you give notification for the purposes of 30(1) (disclosure on taking office) or 31(7) (where the interest is not one already on the register or subject to a pending notification to the Monitoring Officer).

“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.

PART 1 – INTERESTS IN EMPLOYMENT, OFFICE, TRADE, PROFESSION OR VOCATION (i.e. carried on for profit or gain)

1 – EMPLOYMENT ETC in which you, or your partner have a beneficial interest and is carried on for profit or gain.

You

Your Partner

Details of employment/business/
trade/profession or vocation

Name of:

- Employer (if employed)
- Any business carried on
- Any firm in which you are a partner
- Any Company in which you are a paid director
- Name of any person(s) who appointed you to any of the above positions.

2 - SPONSORSHIP

- Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by you in carrying out duties as a member, or towards your election expenses.
- Details of any payment or financial benefit received from a Trade Union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992

3 - CONTRACTS (in which you, your partner or a body in which either of you have a beneficial interest,) with the London Borough of Croydon for the provision of services, goods or works which are not already fully discharged.

You

Your Partner

- Name of party to the contract
- Description of contract
- Nature of your interest

4 - LAND (in which you or your partner have a beneficial interest, within the area of the London Borough of Croydon)

You

Your Partner

- Any beneficial interest in land which is within the London Borough of Croydon

5 - LICENCES (in which you or your partner have a beneficial interest, with the London Borough of Croydon)

You

Your Partner

- Any licence (alone or jointly with others) to occupy land within the London Borough of Croydon for a month or longer

6 - CORPORATE TENANCIES(in which you or your partner have a beneficial interest, with the London Borough of Croydon)

You

Your Partner

Any tenancy where to your knowledge

- i) the landlord is the London Borough of Croydon and
- ii) the tenant is a body in which you or your partner or spouse has a beneficial interest

7 - SECURITIES(in which you or your partner have a beneficial interest, with the London Borough of Croydon)

You

Your Partner

Any beneficial interest in securities of a body where

- a) that body, to your knowledge, has a place of business or land in the London Borough of Croydon and
- b) either – (i) the total nominal value of the securities 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 you, your partner or spouse has a beneficial interest exceeds one hundredth of the total issued share capital of that class

PART 2 - OTHER INTERESTS

GIFTS AND HOSPITALITY: Details of the interests of any person from whom **you** have received a gift or hospitality with an estimated value of £50.00 or more. Please complete Schedule 1 below.

SCHEDULE 1

	Date of receipt of gift/hospitality	Nature of gift or hospitality received	Person/Body from whom gift/hospitality received
1.			
2.			
3			

Please notify the Council Solicitor and Monitoring Officer of any changes to any of this information, in writing (julie.belvir@croydon.gov.uk), within 28 days of the change.

Signed:.....Date:.....

London Borough of Croydon
Notification by Member of a Local Authority of Disclosable Pecuniary Interests
Register of Members' Interests under Section 29 of the Localism Act 2011 and the
Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012

Note: Members are only required to declare those interests of their Partner of which they are aware.

For the purposes of this register:

“Body in which the relevant person has a beneficial interest” means a firm in which the relevant person is a partner, or a body corporate of which the relevant person is a director in the securities of which the relevant person has a beneficial interest.

“Director” includes a member of the committee of management of an industrial and provident society.

“Land” excludes an easement, servitude, interest or right in or over land which does not carry with it a right for the relevant person (alone or jointly with another) to occupy the land or to receive income.

“Partner” means your spouse, civil partner, person with whom you live as husband and wife or person with whom you live as if you are civil partners. (Section 30(3)(b) of the Localism Act 2011).

“Relevant person” means you as a Member or co-opted Member or any other person referred to in Section 30(3)(b) of the Localism Act 2011. That section of the Localism Act prescribes that this includes your partner as defined below.

“Relevant period” means the period of 12 months ending with the day on which you give notification for the purposes of 30(1) (disclosure on taking office) or 31(7) (where the interest is not one already on the register or subject to a pending notification to the Monitoring Officer).

“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.

Failure to register disclosable pecuniary interests as required by the legislation is a criminal offence under the Localism Act 2011

Please notify the Council Solicitor and Monitoring Officer of any changes to any of this information, in writing to (julie.belvir@croydon.gov.uk), within 28 days of the change.

I, the undersigned, an Elected Member or voting co-opted Member of the London Borough of Croydon hereby give notice that I have the following Disclosable Pecuniary Interests (please state 'None' where not applicable).:

Name of Member

Date of appointment to office

1 – EMPLOYMENT ETC in which you, or your partner have a beneficial interest and is carried on for profit or gain.

Details of employment/business/ trade/profession or vocation

Name of:

- Employer (if employed)
- Any business carried on
- Any firm in which you are a partner
- Any Company in which you are a paid director
- Name of any person(s) who appointed you to any of the above positions.

2 - SPONSORSHIP

- Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by you in carrying out duties as a member, or towards your election expenses.
- Details of any payment or financial benefit received from a Trade Union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992

3 - CONTRACTS (in which you, your partner or a body in which either of you have a beneficial interest,) with the London Borough of Croydon for the provision of services, goods or works which are not already fully discharged.

- Name of party to the contract
- Description of contract
- Nature of your interest

4 - LAND (in which you or your partner have a beneficial interest, within the area of the London Borough of Croydon)

- Any beneficial interest in land which is within the London Borough of Croydon

5 - LICENCES (in which you or your partner have a beneficial interest, with the London Borough of Croydon)

- Any licence (alone or jointly with others) to occupy land within the London Borough of Croydon for a month or longer

6 - CORPORATE TENANCIES(in which you or your partner have a beneficial interest, with the London Borough of Croydon)

Any tenancy where to your knowledge

- iii) the landlord is the London Borough of Croydon and
- iv) the tenant is a body in which you or your partner or spouse has a beneficial interest

7 - SECURITIES(in which you or your partner have a beneficial interest, with the London Borough of Croydon)

Any beneficial interest in securities of a body where

- c) that body, to your knowledge, has a place of business or land in the London Borough of Croydon and
- d) either – (i) the total nominal value of the securities 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 you, your partner or spouse has a beneficial interest exceeds one hundredth of the total issued share capital of that class

PART 2 - OTHER INTERESTS

GIFTS AND HOSPITALITY: Details of the interests of any person from whom **you** have received a gift or hospitality with an estimated value of £50.00 or more. Please complete Schedule 1 below.

SCHEDULE 1

	Date of receipt of gift/hospitality	Nature of gift or hospitality received	Person/Body from whom gift/hospitality received
1.			
2.			
3			

Please notify the Council Solicitor and Monitoring Officer of any changes to any of this information, in writing (julie.belvir@croydon.gov.uk), within 28 days of the change.

Signed: Date: