

Global Corporate Policy on Employment of Former Public Officials and Secondment of Employees into Public Bodies – A National Grid Guidance Document

This guidance document sets out the basic principles that are to be followed in relation to the movement of staff between National Grid and a Public Body* and vice-versa.

National Grid is strongly committed to encouraging all who might want to work with us to develop to their full potential. We recognise that going on secondment to a public body might form an important part of employee career development, just as a member of staff at a Public Body might benefit from a secondment at National Grid. Equally, a person might well want to make a permanent career move either from a National Grid to a Public Body or vice-versa.

All of this is wholly legitimate subject to the steps set out in this guidance note being followed.

Who should read this guidance?

This guidance is relevant to managers who are considering permanently employing a current or former public official; managers who are considering releasing an employee to undertake a secondment into a public body; managers who are considering accepting a current public official on a secondment into National Grid; employees considering or preparing to undertake a secondment into a public body; public officials considering or preparing to undertake a secondment with National Grid.

Why do we need this guidance?

The flow of personnel between business and Government can drive innovation, enable the sharing of best practice and expertise and provide an opportunity for individuals to develop their careers. The knowledge, understanding and skills gained from another sector can enable better working in both sectors individually and when working together on complex problems. However, the 'revolving door' approach also raises the risk of potential conflicts that we are committed to managing to the highest standard.

Hiring people with contacts or knowledge gained from their time in government or the public sector has the potential to be seen as an attempt to buy access and influence. National Grid recognises that if such movements across sectors are not managed carefully, they might damage public trust and confidence in public office holders and the decisions they take. It could also have implications for National Grid's own reputation. Hence the need for clear guidance in this critical area.

Secondments

- A Secondment Agreement must be put into place for anyone from National Grid who is seconded to a Public Policy and vice-versa. As part of the review process leading up to such

an agreement being formalised, a proper assessment must be made by both parties of potential conflicts of interests and how these will be mitigated.

- On a case by case basis, agreement then can be reached as to whether conflicts of interest exist and if so, whether they can be mitigated.
- If there are no conflicts of interest identified through due diligence, we would still expect both organisations to be mindful of the scope for potential conflicts of interest to emerge during the secondment period and to keep this under review.
- If conflicts of interest are identified, appropriate mitigation (whether a “cooling off period” or information/ participation restrictions or some other form of mitigation) must be put in place.
- If conflicts of interest are identified that cannot be mitigated, the secondment should not go ahead.

Permanent moves to or from a Public Body

- In many instances employment contracts will contain obligations concerning cooling off periods between roles and these must always be adhered to, absent of any other agreement. [Such agreement only being possible where all parties are agreed that no live conflict of interest exists.]
- When hiring into National Grid from a Public Body, Managers should always consider whether this might create conflicts of interest and should seek further guidance from HR if unsure.

What steps should a recruiting/ releasing manager take if they have concerns?

The recruiting/releasing manager should consider the risk that the secondment or employment offer might create a conflict of interest for the individual(s) concerned and/or for the organisations. The recruiting/releasing manager should consider with Human Resources and Compliance departments how best to mitigate any potential issues. This could apply to any National Grid-related activities that the employee/seconded worked on while in his/her previous role. This requirement may also extend to prohibiting any direct engagement with former departmental colleagues still working on those projects for up to six months.

*A “Public Body,” in this context includes UK Government, Federal, State and County Government and associated Civil Servants/ Public Officials.