

# Register of interests policy and procedure



<b>1.</b>	<b>Scope</b>
1.1	This policy applies to the Information Commissioner, all members of her Management Board and Audit Committee and the General Legal Counsel (relevant persons).
<b>2.</b>	<b>Introduction</b>
2.1	A register of interests is to be completed by all relevant persons.
2.2	The purpose of the register is to provide information to the public about the interests of relevant persons which might influence their judgement, decision making and actions, or which might be perceived by a reasonable member of the public as doing so.
<b>3.</b>	<b>The register of interests</b>
3.1	On appointment to the Management Board or Audit Committee, Corporate Governance will send the relevant person a copy of this policy and a register of interests form to complete. The form is to be completed and returned within a month.
3.2	Once completed the form will be published on the ICO's website.
3.3	Corporate Governance will ask relevant persons to review their entry annually, in August, to help ensure that register entries are up to date.
<b>4</b>	<b>Declaring interests at a meeting</b>
4.1	Before discussion at any particular Management Board or Audit Committee meeting, relevant persons should declare any interests they have which relate to specific agenda items. These should be declared even if already notified on the register of interests.
4.2	Once an interest is declared the Management Board or Audit Committee may decide to: <ul style="list-style-type: none"> <li>• permit the full participation of the relevant person in discussion of the item;</li> <li>• permit the relevant person to participate in discussion but not to be involved in the decision made; or</li> <li>• ask the relevant person to leave the meeting for the duration of discussion and decision making on the item.</li> </ul>
<b>5</b>	<b>Uncertainty about declaring any particular interest</b>
5.1	Where there is uncertainty about whether a particular interest should be declared, advice should be sought from the Senior Corporate Governance Manager in the first instance and then the Commissioner or chair of the Audit Committee.

<b>6 Responsibilities</b>	
6.1	Relevant persons are responsible for ensuring that their entry is up to date and accurate and that any interests are declared at meetings as appropriate.
6.2	Corporate Governance is responsible for keeping the policy up to date and for administering the policy in a timely and accurate way.
<b>6 Complaints</b>	
6.1	Where there is a complaint about a failure to disclose a relevant interest, the complaint will be referred to the Information Commissioner.

Peter Bloomfield  
Senior Corporate Governance Manager  
Corporate Governance

Tuesday 10 October 2017



## Disclosure of interests

### Personal details

Name	
Position at the ICO	
Date completed	

### Relevant interests

#### Directorships

1. Details of any directorships.

Name of organisation	Nature of organisation	Details of directorship

#### Employment

2. Details of any other employment.

Name of organisation	Nature of organisation	Details of employment

#### Voluntary positions

3. Details of any voluntary work.

Name of organisation	Nature of organisation	Details of voluntary work

#### Political activity

4. Details of any political activity.

Political activity	Details

### Financial or material interests

5. Details of any sponsorship or financial or material support that you receive from an organisation.

Name of organisation	Details of financial or material support

6. Details of any organisation in which you hold a total investment or other interest which has a value over £25,000 or which accounts for more than 1/100<sup>th</sup> of the issued shares or securities of that organisation, or of any class of such shares or securities<sup>1</sup>.

Name of organisation	Details of financial or material interests

### Other relevant interests

7. Details of any other interests, including the significant interests of family and friends, which might affect the carrying out of your duties at the ICO, or which might be perceived by a reasonable member of the public as doing so.

Any other relevant interests	Details

If you are in any doubt as to what to, or not to, include please contact Peter Bloomfield in the first instance.

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<sup>1</sup> This does **not** include the purchase of financial products such as endowment policies and pension plans. And in answering question 6 the amount of the investment or interest, and the inclusion of any information which might provide a security risk, will not be needed.