

## Board meeting declarations of interests policy

<b>Document name</b>	Board meeting declarations of interests policy
<b>Version number</b>	V1.0
<b>Status</b>	Published
<b>Department/Team</b>	Corporate Governance
<b>Relevant policies</b>	<a href="#">Code of Conduct</a> , <a href="#">Policy and procedure regarding declarations of interests and secondary employment</a> , <a href="#">Policy and procedure regarding party political activities</a>
<b>Distribution</b>	External
<b>Author/Owner</b>	Chris Braithwaite
<b>Approved by</b>	Louise Byers
<b>Date of sign off</b>	December 2022
<b>Review by</b>	December 2023
<b>Security classification</b>	Official

### Key messages

The main objective of this policy is to explain the need for declarations of interests by members of Management Board, Executive Team, or Management Board Committees. The policy also explains the need for declarations of interest at internal board meetings.

### Does this policy relate to me?

This policy relates to you if you are a member of the Management Board, Executive Team, one of the Management Board Committees, or any of the internal Board meetings. Members of the Corporate Governance team should also be aware of the policy in order to provide advice.

This policy is not concerned with declarations of interest by all staff. These are governed by the Code of Conduct, available [at this link](#).

### Table of contents

1. Introduction.....	2
----------------------	---

2.	Register of interests .....	2
3.	Declarations of interests at meetings .....	3
4.	Complaints .....	3
	Feedback on this document .....	4
	Version history .....	4

## 1. Introduction

- 1.1. A declaration of interests is to be completed by all relevant persons. Relevant persons are members of Management Board, Executive Team, or any of the Management Board Committees.
- 1.2. The purpose of declarations of interests is to provide information to the public about the interests of key decision makers which might influence their judgement, decision-making and actions, or which might be perceived by a reasonable member of the public as doing so. The register of interests sets out the course of action should an interest become pertinent to the relevant person's work. These declarations will be published on the ICO's website by Corporate Governance.
- 1.3. In addition, at each internal board meeting, members will be asked to declare any interests which they have in any items to be discussed at that meeting. Such declarations are not published online, but the same principles as set out in the policy apply.

[Back to Top](#)

## 2. Register of interests

- 2.1. On appointment to Management Board, Executive Team, Audit Committee, People Committee or Regulatory Committee, a relevant person will be asked to complete a register of interests.
- 2.2. The register of interests also sets out what each relevant person will do in the event that the potential conflict of interest they have identified arises. This will usually explain whether the person will continue to take part in discussion and/or decisions on this matter, or whether they will withdraw from involvement on this matter. This will usually be based on whether there is a risk of bias (or a risk of perception of bias) if the person is involved in the matter.

- 2.3. This register of interests will be published on the ICO's website [at this link](#). This ensures a clear public record of any potential conflicts of interests for relevant persons.
- 2.4. Relevant persons will be asked to review the register of interests at least annually. Relevant persons can also update their register of interests at any time.

[Back to Top](#)

### 3. Declarations of interests at meetings

- 3.1. There will be an item on the agenda for attendees to declare any interests which they have in any items on the agenda for that meeting. This applies for Management Board, Executive Team, Audit and Risk Committee, People Committee, Regulatory Committee, Senior Leadership Team and all of the Senior Leadership Team Boards. Declarations made will be recorded and published in the minutes.
- 3.2. It is good practice to have this agenda item for any other formal meetings, but is not a requirement.
- 3.3. For relevant persons, if they have already declared an interest on their register of interests, it is good practice to declare that interest again in any meetings where it is likely to be a factor. This reduces the risk of there being a perception that any potential conflict is being hidden.
- 3.4. Ideally, all interests should be declared within the declaration of interests item. However, there will be occasions when a potential interest only arises due to the direction of discussion during an agenda item. In such circumstances, the person should declare their interest at the earliest opportunity.

[Back to Top](#)

### 4. Complaints

- 4.1. Where there is a complaint about a perceived failure of a relevant person to disclose a relevant interest, the complaint will be referred to the Information Commissioner.

[Back to Top](#)

## Feedback on this document

If you have any feedback on this document, please [click this link](#) to provide it.

[Back to Top](#)

## Version history

Version	Changes made	Date	Made by
1.0	Policy created to distinguish between policy and procedure.	Nov 2022	Chris Braithwaite

[Back to Top](#)