

# Publication of declaration of interests policy and procedure



Information Commissioner's Office

<b>1.</b>	<b>Scope</b>
1.1	This policy sets out the policy and procedure for publication of declarations of interest. This applies to the Information Commissioner, all members of their Management Board, Executive Team, and Audit and Risk Committee. These are collectively referred to as “relevant persons” for the purpose of this policy.
1.2	This policy is not concerned with declarations of interest by all staff. These are governed by the relevant human resources policies.
<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. The register also sets out the course of action should an interest become pertinent to the relevant person’s work.
<b>3.</b>	<b>The register of interests</b>
3.1	On appointment to the Management Board, Executive Team or Audit and Risk 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, each July, to help ensure that register entries are up to date. Relevant persons should contact Corporate Governance at any time if they need to provide an updated declaration. Relevant persons also declare any relevant interests at each meeting.
3.4	There will be some circumstances in which a relevant person must declare an interest that is not suitable for publication (such as for reasons of personal security). In such circumstances, the interest should still be declared to Corporate Governance, who will record that an interest has been declared, but will publish a redacted version of this interest to the website.
3.5	The register of interests will set out which of the actions the relevant person will take should any of the interests included within their declaration become relevant to issues being discussed. This may include: <ul style="list-style-type: none"> <li>• fully participating in discussion of the item. This will usually be the case when the interest is not directly relevant to the issue in question and there is no risk of the ICO being accused of bias;</li> </ul>

- participating in discussion but not being involved in the decision making. This will usually be the case when there are no financial implications to the relevant person in question for the issue in question and/or a minimal risk of the ICO being accused of bias;
- leaving the meeting for the duration of discussion and decision-making on the item. This will usually be the case when there are any financial implications to the relevant person in question, or there is a risk of the ICO being accused of bias.

#### **4 Declaring interests at a meeting**

- 4.1 Before discussion at any meeting, relevant persons should declare any interests they have which relate to specific agenda items. These should be declared at the meeting even if already included on the register of interests. These declarations will be recorded in the minutes.
- 4.2 Once an interest is declared at a meeting, the committee may decide to allow the relevant person to continue to participate in the meeting, in line with the guidance set out at paragraph 3.5.
- 4.3 When a declaration is made at a meeting, the relevant person should contact Corporate Governance to ensure that their register of interests is updated accordingly.

#### **5. Responsibilities**

- 5.1 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. Where a relevant person is uncertain about whether a particular interest should be declared, they can seek advice from the Senior Corporate Governance Manager in the first instance, and then the Commissioner or chair of the Audit and Risk Committee. The responsibility for the declaration, however, always lies with the relevant person.
- 5.2 Corporate Governance is responsible for keeping the policy up to date and for administering the policy in a timely and accurate way.

#### **6 Complaints**

- 6.1 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.

#### **7. Other relevant policies**

- 7.1 The register of interests policy is one of a range of ICO policies that are in place to ensure that the ICO acts appropriately in its role as a public authority. Relevant persons should ensure that they are aware of these policies.

**Author:** Chris Braithwaite

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Author/owner	Chris Braithwaite
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Version	Changes made	Date	Made By
V5.1	Added version control panel. Amended title of policy. Clarified limited scope of the policy. Amended timing of annual review to bring in line with existing practices.	September 2021	Chris Braithwaite

## Register 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	Action to take <sup>1</sup>

#### Employment

2. Details of any other employment.

Name of organisation	Nature of organisation	Details of employment	Action to take <sup>1</sup>

#### Voluntary positions

3. Details of any voluntary work.

Name of organisation	Nature of organisation	Details of voluntary work	Action to take <sup>1</sup>

#### Political activity

4. Details of any political activity.

Political activity	Details	Action to take <sup>1</sup>

<sup>1</sup> The purpose of this column is to set out in advance the action that you will take should that interest become relevant any issues being discussed during your role at the ICO. This may be: fully participate; participate in discussions but not decisions; withdraw from discussion and decision. See paragraph 3.5 for further guidance regarding this.

### 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	Action to take <sup>1</sup>

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>2</sup>.

Name of organisation	Details of financial or material interests	Action to take <sup>1</sup>

### 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	Action to take <sup>1</sup>

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

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<sup>2</sup> This does **not** include financial products such as endowment policies and pension plans. You also do not need to provide the amount of the investment or interest.