



**Cloch Housing Association**

# **Disclosure of Interest Policy**

<b>Policy Name</b>	Disclosure of Interest
<b>Policy Category</b>	GOV
<b>Policy Number</b>	058
<b>Date Adopted</b>	01/09/2009
<b>Last Review</b>	20/10/2020
<b>This Review</b>	12/10/2021
<b>Next Review</b>	October 2024
<b>Equalities Impact Assessment Required</b>	No
<b>Link to other policies</b>	Code of Conduct, Entitlements Payments and Benefits
<b>Consultation</b>	No
<b>Need for Procedure</b>	No

All Board Members, Staff and Consultants are required to complete on an annual basis, a Disclosure of Interest Form.

The forms will be kept by the Cloch Director and will be open to inspection by the Scottish Housing Regulator, The Scottish Government, the Financial Conduct Authority, Shareholders, Board Members and Tenants. The information supplied will be used to complete Annual Returns to the Financial Conduct Authority, the Scottish Housing Regulator etc.

The Regulatory Standards of Governance & Financial Management published by the Scottish Housing Regulator on 2012 set out the Regulator's expectations following the implementation of the legislative provisions of the Housing (Scotland) Act 2012.

In order to comply with these standards, the Association maintains a register of disclosure of interests and requires all staff, Board members, to complete a disclosure of interest for each year. This Policy should be read along with the Codes of Conduct and the Entitlements, Payments & Benefits Policy

Please complete and sign the form and return to the Cloch Director. **Even if you have nothing to declare, please complete no. 1 to 4 and sign.**

1. Name: .....

2. Address: .....

3. Qualifications .....

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4. Profession/Occupation .....

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5. Name of Employer/Practice .....

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6. Voluntary Interest .....

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**N.B.** Please give details here of any Voluntary Organisation of which you are a member (specifying if you serve in a Board capacity) which may have a possible overlap with the Group's work, such organisations may include: other housing associations, voluntary groups with which the Association works, welfare groups etc.

7. Professional Interests.....

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**N.B.** Please give details here of any interest in any business trading for profit in which you or persons closely connected to you (see Item 11 for information), are concerned. This applies not only to professional and contractual interests but also to other individual or corporate interests connected with land, housing, finance and related matters.

Staff who undertake work in a private capacity, must disclose this work if it is likely to have a relationship/overlap with the work of the Association.

8. Positions of Public Responsibility Held .....

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**N.B.** Refers to central or local government of parliamentary activities or other public bodies. Please give details for self and close connection as detailed in Cloch's Code of Conduct.

9. Relatives with possible overlapping interests .....

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**N.B.** It is possible that you may be have a close connection to, for example, a contractor or consultant who may at the present time or in the future undertake work for the Association, and this information should be detailed here.

Please inform the Director of any changes in this information.

10. Any other information to be disclosed (eg use of an Association contractor)

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If any contractor or consultant used by the Association does any work for you, this should also be disclosed to the Director and any work that you may do for one of our contractors or consultants.

***I consent to Cloch Housing Association processing the Data provided by me on this form. I understand that this Data will be used by the Association to ensure that it is meeting its obligations.***

**Signed** .....

**Date:** .....

## 11 Definition of Close Connection

Group	Required Response
<p><b>1. Members of your household</b></p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• Anyone who normally lives as part of your household (whether related to you or otherwise)</li> <li>• Those who are part of your household but work or study away from home</li> </ul>	<p>We expect you to be aware of and declare any relevant actions of all people in your household. You must take steps to identify, declare and manage these.</p>
<p><b>2. Partner, Relatives and friends</b></p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• Your partner (if not part of household)</li> <li>• Your relatives and their partners</li> <li>• Your partner's close relatives (i.e. parent, child, brother or sister)</li> <li>• Your close friends</li> <li>• Anyone you are dependent upon or who is dependent upon you</li> <li>• Acquaintances (such as neighbours, someone you know socially or business contacts/associates)</li> </ul>	<p>Where you have a close connection and are in regular contact with anyone within this group, we expect you to be aware of and declare any relevant actions. Under these circumstances, you must take steps to identify, declare and manage these actions.</p> <p>Where you do not have a close connection and regular contact with someone in this group, we do not expect you to be aware of or to go to unreasonable lengths to identify any relevant actions. However, if you happen to become aware of relevant actions by such individuals, then these should be declared and managed as soon as possible.</p>

- 11.1 If you become aware of any action or involvement relating to **anyone** in the table above, then you should declare and manage this as soon as possible.
- 11.2 However, we recognise that you will not always be closely acquainted with or in regular contact with all of the people listed and we do not expect you to go to unreasonable lengths to identify actions or involvement that are covered by this policy.
- 11.3 Please note, we do expect you to be familiar with the actions of members of your household and of any other people listed in the table above with whom you are closely associated and/or in regular contact and you must take steps to identify, declare and manage these.
- 11.4 **You are not expected to be aware of the actions of people in 2 above, that you do not have a close association and/or regular contact with.** We do not expect you to research into the employment, business interests and other activities of all persons with whom you are closely connected.
- 11.5 In relation to 10.1 – 10.4 above, when considering your actions you should do so from the point of view of a reasonable and objective observer.

## 12 Declaring personal interests

- 12.1 Governing Body Members and Staff Members will be required, on appointment, to complete a form to register any personal interests that could potentially conflict with their role and thereafter to complete a new form (or amend the existing form) whenever there is a material change.
- 12.2 You must keep your entry in the Register of Interests up to date, add any new interests as soon as they arise, and amend existing interests as soon as any change takes effect.
- 12.3 A situation may arise where you are invited to be present at a meeting where a matter in which you have a personal (or a personal business or financial) interest is discussed. In such cases you must inform the meeting chair at the start of the meeting, or as soon as you become aware that this is the case. You would then be required to leave the meeting for the duration of the particular item. If in any doubt, you should ask the meeting chair or another senior person present for guidance. This applies to all meetings that you attend as a member of our Governing Body or Staff Member – both internal and external.
- 12.4 Any failure to make a complete, accurate and prompt declaration - whether deliberately or through taking insufficient care - will be regarded as a breach of this Code.