

Declaration of Interests Policy

1.0 Introduction

- 1.1 The Wrekin Housing Group ('the Group') is committed to maintaining the highest standards of professionalism to enable our stakeholders to have confidence in our integrity and to protect the reputation of the Group.
- 1.2 Board Members, Committee Members, Employees and Involved Residents of the Group, Choices Housing Association and subsidiaries have a duty under common law to act in the best interests of the organisation and should not benefit from the business (other than agreed remuneration and reimbursement of properly incurred expenses) or be influenced by their wider interests when making decisions affecting the business.
- 1.3 Under s175¹ and S177² of the Companies Act 2006, Executive and Non-Executive Directors and Trustees of charities have a duty to avoid conflicts of Interest and declare an interest in a proposed transaction or arrangement.
- 1.4 Non-Executive Directors and Trustees should ensure they meet the Fit and Proper Person Requirements of under regulation 5³ of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.
- 1.5 This Policy should be read in conjunction with the Group's Declaration of interest Procedure and the Code of Conduct Policy.

2.0 Policy Statement

- 2.1 Board Members, Committee Members, Employees and Involved Residents are required to promptly declare their, and to use reasonable endeavours to confirm those of any 'connected person(s)', business interests and potential conflicts of interest.
- 2.2 At each Board and Committee meeting any declarations of interest or conflict relating to the agenda or any other business matters must be declared.
- 2.3 The NHF Code of Governance requires the Group to have a publicly available register for Board and Committee Member declarations of interest which is reported on annually to the board.
- 2.4 The NHF Code of Conduct requires those involved within housing associations to act in the best interest of the housing association and its residents, behave with integrity, conduct themselves professionally, treat others well, protect themselves, others and the environment.

¹ [Companies Act 2006 \(legislation.gov.uk\)](http://legislation.gov.uk)

² [Companies Act 2006 \(legislation.gov.uk\)](http://legislation.gov.uk)

³ [Regulation 5: Fit and proper persons: directors - Care Quality Commission \(cqc.org.uk\)](http://cqc.org.uk)

3.0 Policy Scope

3.1 This policy applies to all Group employees, including those on temporary, agency or fixed term contracts, Board and Committee members and involved residents.

3.2 It is also applicable to those who the Group have informed and asked to comply with this policy such as: contractors, consultants, suppliers, commercial partners, customers/service users, volunteers and other associated persons with the Group.

4.0 Definitions

4.1 **Conflicts of Interest** arise when the professional and/or personal interests of the individual or 'connected person' are incompatible or in competition with the interests of the business which may or may appear to influence their decision making. This could include: -

- Having an interest in a business which directly or indirectly earns income or fees from the Group, is a customer of the Group, otherwise has a trading relationship or is in any way a competitor of the Group.
- Being engaged as a Board member / employee / consultant of another housing organisation within the Group's area of operation.

4.2 **Connected Person** means your spouse or partner, parent, grandparent or great-grandparent, child, grandchild or great-grandchild, brother, sister (including step brother or sister) or any other relation by marriage.


5.0 Roles and Responsibilities

5.1 Those named in paragraph 3.1 and 3.2 should ensure they act in accordance with the Group's policies, the NHF Code of Conduct 2022, NHF Code of Governance 2020 and the Contract or Agreement under which they are appointed.

5.2 Upon commencing employment or involvement with the Group, those named in 3.1 and 3.2 should complete the Declaration of Interest Form. This should be updated when any changes arise and reviewed at least annually. Changes will be recorded on the Declaration of Interest Register.

5.3 Board and Committee members should notify and obtain the prior sanction of the Group Chair, who will act on behalf of the Group Board, of any subsequent appointments to other housing organisations or transactions in businesses in similar services. A side letter will be issued to state that the Group Chair notes the members role in the sector and provides authorisation for this. The list of external interest will be monitored to assess if a conflict is likely to arise over time.

5.4 When recruiting Board and Committee members it is likely that applicants may be linked to other housing organisations. Where candidates have the required skills but also have a potential conflict, a balance will be struck between securing appropriate expertise and the nature and extent of the conflict. Where a conflict



exists, either actually or potentially, and is not manageable, an appointment shall not be made.

5.5 Should a Board or Committee member apply for a role within the organisation, the member will be required to resign at the point of application to the Group.

5.6 Should an involved resident apply for a role within the organisation, the resident will be required to resign at the point of application to the Group.

The Wrekin <u>Housing Group</u>	Policy Control Sheet Declaration of Interests Policy Policy reference number – 2024/007
Policy Author	Angelina Hicklin Governance Manager
Direct Lead	Jan Lycett Executive Director of Business Solutions and Company Secretary
Version	2.0 - March 2024
Target audience	Employees, Involved Residents, Board and Committee members of the Group entities: <ul style="list-style-type: none"> • The Wrekin Housing Group • Choices Housing Association • Old Park Services • Strata Housing Services Including • Agency staff • Contractors • Consultants • Suppliers • Customers / service users • Volunteers
Consultation	Employee Forum Trade Unions David Tolson Partnership (DTP) Senior Managers Executive Management Group
Date of Equality Impact Assessment	An Equality Impact Assessment was completed on the 23 rd February 2024. No individuals or groups of people are disadvantaged by the adoption of this policy
Date of Data Privacy Impact Assessment	The information contained in this policy is low risk therefore no DPIA is required
Approving Body	The Wrekin Housing Group Board
Date of final approval	27 th March 2024
Implementation date	April 2024
Monitoring arrangements	Declaration of Interests Register Quarterly report to the Audit & Assurance Committee
Reporting	Declaration of Interest Register reported to the Executive Team and the Audit & Assurance Committee
Review date	October 2026
Expiry date	April 2027
Review cycle	3 year review cycle
Policy category	Corporate and Governance
Associated policies and procedures	Anti-Bribery and Corruption Policy Code of Conduct Declaration of Interests Procedure Disciplinary Policy EDI Strategy Equal Opportunities Policy

	Gifts and Hospitality Policy Standing Orders
Policy location	SharePoint Wrekin Housing Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Catherine Rogerson	Separated policy from procedure / policy reviewed in line with review date	1.0 April 2021	The Wrekin Housing Group Board – 7 th April 2021
Angelina Hicklin	Policies reviewed in line with review date. Combined the Declaration of interest's policy – employees and involved residents with the Declaration of interest Board member policy.	2.0. March 2024	The Wrekin Housing Group Board – 27 th March 2024