



GROUP POLICY

DECLARATION OF INTERESTS BY GOVERNING BODY MEMBERS AND EMPLOYEES

Approved: August 2024
Review Date: August 2027

If you have difficulty with sight, or if you require a translated copy of this policy, we would be pleased to provide the information in a form that suits your needs.

1. Purpose of this Policy

- 1.1 This Policy describes the practical steps governing body members and employees should take, to declare and manage any personal, financial or business interests that are relevant to our business.
- 1.2 The Policy applies to both Govanhill Housing Association (GhHA) and Govanhill Community Development Trust (GCDT). This means that governing body members and employees in both organisations must declare any interests they have that relate to the work of both GhHA and GCDT.

2. Related Policies

- 2.1 Governing body members and employees within the Group must also comply with the following policies:
- Codes of Conduct
 - Entitlements, Payments and Benefits
 - Gifts and Hospitality
 - Anti Bribery
- 2.2 This Policy is consistent with our codes of conduct for committee members and for employees. As a committee member or employee, the Codes of Conduct require you to declare openly, and manage effectively, any potential conflict between your role with us and your other interests. This means that you must:

- **Declare promptly** any personal, financial or business interests you and people closely connected to you may have that are relevant to our business and our current or future decisions;
- **Record these interests** in the Register of Interests and keep your entry in the Register complete, accurate and up to date;
- **Not play any part in discussions or decisions** on matters affected by the interest you have declared.

3. Completing a Declaration of Interests Form

- 3.1 All governing body members and employees must complete a **declaration of interests form** and have regard to the accompanying notes on completion. The form must be completed:
- Upon first joining GhHA or GCDT,
 - As part of annual updates co-ordinated by the Director's team
 - If any changes occur to a member's or employee's interests, in between the annual updates
- 3.2 The form sets out the range of interests governing body members and employees must declare, including in some cases the interests or activities of people who are closely connected to them. The Guidance Notes on Completion attached to the form explain the meaning of the term "closely connected".
- 3.3 The information provided by governing body members and employees will be recorded in a Register of Interests. The Register shall be a public document, and will strike an appropriate balance between public disclosure of relevant interests and responsible

use of personal information. Further information is provided in the Guidance Notes on Completion.

4. Information collected from service users and suppliers

- 4.1 Our codes of conduct recognise that governing body members and employees are not always aware of the actions of family members and friends and should not be required to conduct research into this.
- 4.2 We will ask service users and suppliers to tell us about any close connection they may have to governing body members and employees in the Govanhill Group. Our approach to doing this will be risk-based. We will focus our resources on areas where a failure on our part to identify any close connections could damage our reputation or could undermine community confidence in the fairness and objectivity of our decisions.
- 4.3 Applying these principles, we will always ask for information about any connections to governing body members and employees in the following service/business areas:

- Housing application forms
- Job application forms
- Applications to lease commercial properties or workspace units
- Documentation relating to the purchase or sale of land or property
- Company information forms for businesses on our lists of approved suppliers or contractors, where the annual value of work placed exceeds or is likely to exceed £1,000
- Tender lists or procurement documentation

5. Checking for relevant interests when decisions are being made

- 5.1 The responsible staff member should check the Register of Interests and any disclosures provided by applicants for housing, employment, commercial contracts etc, and note any interests or connections in the relevant files and systems. The Register will be held in electronic format, to facilitate the necessary searches.
- 5.2 If an interest has been declared in the Register or the relevant applicant/supplier form, the potential conflict of interest should be managed by following:
- The policy/procedures for the business area concerned and, where relevant,
 - The procedures for decision-making set out in the Payments and Benefits Policy (including any requirements for committee approval, as set out in the Policy).
- 5.3 If the procedures to be followed are unclear, staff should refer the matter to their head of department for further guidance, as required.

6. Conduct at meetings and involvement in decision-making

- 6.1 You must always inform the person chairing a meeting, if you are attending a meeting and a matter in which you have a personal, business or financial interest is to be discussed. You should do this at the start of the meeting, or as soon as you become aware that you have an interest where this was not apparent from the agenda. Any interests declared at meetings will be recorded in the minutes of the meeting, along with a statement explaining what action was taken in response to the declaration.
- 6.2 If you have a personal, business or financial interest in a matter to be discussed, you must normally leave the meeting for the duration of the relevant agenda item and play no part in decision-making. For the avoidance of doubt:

- If committee approval is required under GhHA's Policy on Payments and Benefits, anyone affected by a declaration of interest must withdraw from the committee meeting while the matter is discussed and decided.
- Governing body members who are tenants or factored owners can take part in discussions and vote on all policy, financial and performance matters, but not matters that relate specifically to their own tenancy or factoring agreement or that of someone they are closely connected to.
- Committee members who are also members of other groups (e.g. a Registered Tenants Organisation) should leave the meeting during any discussions or votes relating to funding for the group they are involved with.
- Committee members who are also directors of GCDT can take part in discussions and vote on matters relating to GhHA's relationship with GCDT, unless the matter under discussion concerns a proposed contractual arrangement with GCDT. For example, the signing of the Service Level Agreement or the sale or acquisition of property or land.

7. Conflicts of Interest

- 7.1 A declaration of interest will not by itself prevent the governing body from approving a particular course of action, if the course of action is lawful and is consistent with our policies. For example, our Policy on Payments and Benefits sets controls on payments and benefits, but does not prohibit them in every circumstance since that would unfairly disadvantage committee members and their families.
- 7.2 There are some types of conflicts of interest that would make a governing body member's position untenable. For example:
- Governing body members must never have a financial interest in any business trading for profit that is seeking to enter into a business relationship with GhHA or GCDT.
 - GhHA committee members must always act in the best interests of the Association and should not promote the interests of a particular group or body of opinion to the exclusion of others.
- 7.3 If a governing body member has a major or ongoing conflict of interest that impairs their objectivity or their ability to act in our best interests, they should consider resigning. Alternatively, the remaining members of the governing body may seek the member's resignation or take steps to remove them.

8. Compliance with this Policy

- 8.1 This Policy has been adopted, to help ensure that our affairs are conducted with transparency and integrity. Failure to comply with this Policy may result in disciplinary action against governing body members or employees, in line with the codes of conduct and the accompanying Protocol for addressing alleged breaches.

GOVANHILL HOUSING ASSOCIATION LTD. DECLARATION OF INTERESTS BY GOVERNING BODY MEMBERS AND EMPLOYEES	
Your Name	Job Title/Role
Part 1: Checklist for identifying interests you should declare (please tick Yes/No for all questions)	
YOUR OWN INTERESTS	<input type="checkbox"/> Yes <input type="checkbox"/> No
1) Are you a tenant of the Association, or on our list for rehousing?	<input type="checkbox"/> Yes <input type="checkbox"/> No
2) Do you receive any other services from the Association or any of its subsidiaries (e.g. care/support services or factoring services for a property you own or live in)	<input type="checkbox"/> Yes <input type="checkbox"/> No
3) Are you a director of any other organisation in our group structure?	<input type="checkbox"/> Yes <input type="checkbox"/> No
4) Are you a member or office-bearer of a Registered Tenants Organisation?	<input type="checkbox"/> Yes <input type="checkbox"/> No
5) Are you a member or director of any other voluntary or community organisations that are active in our local area?	<input type="checkbox"/> Yes <input type="checkbox"/> No
6) Do you do paid or voluntary work with any organisation that does, or is likely to do, business with us?	<input type="checkbox"/> Yes <input type="checkbox"/> No
7) Is your spouse/partner or anyone you are related to a committee member or employee of the Association or any of its subsidiaries?	<input type="checkbox"/> Yes <input type="checkbox"/> No
8) Do you have a significant financial or business interest* in any company that does, or may seek to do, business with the Association or GCDT? * Full or part ownership of a company that distributes profits; and/or being a director/senior manager and/or a substantial shareholding in such a company	<input type="checkbox"/> Yes <input type="checkbox"/> No
9) Are you an elected member of Glasgow City Council or of any other housing association?	<input type="checkbox"/> Yes <input type="checkbox"/> No
10) Are you a member of any political, campaigning or other body whose interests and/or activities may affect our work or activities?	<input type="checkbox"/> Yes <input type="checkbox"/> No
11) Have you purchased goods or services from any of our approved contractors/suppliers or framework agreement partners? <i>Reminder: as well as declaring an interest, you must notify your head of department (employees) or the Chairperson and Director (committee members) before you do this</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
12) Do you own any land or property in our area of operation? (excluding any house in which you normally live)	<input type="checkbox"/> Yes <input type="checkbox"/> No
13) Are you involved in any unresolved dispute with the Association or any of its subsidiaries? (e.g. in relation to the provision of services, a tenancy agreement or lease with us, or a contractual dispute with us)	<input type="checkbox"/> Yes <input type="checkbox"/> No
THE INTERESTS OF PEOPLE YOU ARE CLOSELY CONNECTED TO	
To the best of your knowledge:	
14) Is anyone closely connected to you a tenant of ours, or on our list for rehousing?	<input type="checkbox"/> Yes <input type="checkbox"/> No
15) Does anyone closely connected to you receive other services from the Association or any of its subsidiaries (e.g. care/support services or factoring services for a property they own or live in)	<input type="checkbox"/> Yes <input type="checkbox"/> No
16) Is anyone closely connected to you currently seeking employment with the Association	<input type="checkbox"/> Yes <input type="checkbox"/> No

or any of its subsidiaries?	
17) Does anyone closely connected to you have a financial or business interest* in any company that does, or may seek to do, business with the Association or any of its subsidiaries? *[see definition at 8) above]	<input type="checkbox"/> Yes <input type="checkbox"/> No
18) Do you, or anyone closely connected to you, have any other interests that you should declare because they are relevant to our activities or to your role as a Committee Member or employee of the Association or its subsidiaries?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Part 2: Description of the interests you are declaring

For the boxes in Part 1 where you have ticked "Yes", please provide details of the interest you are declaring. You should use the numbers in Part 1, then provide enough information to make clear what interest you are declaring and who the declaration relates to. See the examples below on how to describe things.

Examples

- 1) *I am a tenant of the Association (joint tenancy with my partner Alan Mackay)*
 3) *I am also a Board member of Govanhill Community Development Trust*
 5) *I am a board member of MoneyZone (local service providing welfare rights and money advice)*
 15) *Sister (Mary Quinn, 45 Grove Street) lives in a house factored by the Association*
 17) *Partner (Alan MacKay) owns a small building firm (AMK Contracts). No contracts with the Association.*

Is there any reason why any of the information in this declaration of interests should be regarded as confidential? If yes, please provide brief details.	<input type="checkbox"/> Yes <input type="checkbox"/> No
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The information provided in this declaration is truthful and accurate, to the best of my knowledge.

I have read and understood the policy and I agree to update my declaration if there are any changes or additions to the interests I have declared.

Signed: **Date:**

Guidance Notes on Completion

- 1) We will ask you to review your declaration of interests each year and will record the interests you declare in the Register of Interests.
 - 2) You should contact us with details of any changes or updates, as soon as they arise.
 - 3) To make the declaration easy to complete, the form is in two parts:
 - In Part 1, tick Yes or No for all of the questions that are asked
 - In part 2, provide a brief description of the interest you are declaring for each of the questions you ticked as Yes.
 - 4) Most of the questions relate to your own interests, but some of the questions ask about people you are “closely connected to”. This term is used in our codes of conduct, please see the relevant parts of the codes of conduct which are reproduced below.
 - 5) If you are in any doubt about whether you need to declare an interest, you should seek advice from your head of department (employees) or from the Director or Chairperson (governing body members).
 - A good test is to ask yourself how an interest or relationship, if not disclosed and recorded in the Register of Interests, might be seen by rent-payers, members of the local community or the media.
- 8.2 We will administer the Register of Interests for GhHA and GCDT. They will do this by:
- Sending out declaration forms for completion/ updating, along with a listing of the Group’s contractors and suppliers;
 - Entering the information provided by governing body members and employees in the Register of Interests.
- 8.3 Information in the Register of Interests will be available for public inspection. The public register will record the interest being declared but will not disclose personal information about individuals unless this is essential in the interests of transparency.
- For example, it would be sufficient for the public register to state *“My sister is a GhHA tenant”,* rather than *“My sister Mary Smith is a GhHA tenant living at 510 Cathcart Road, flat 2/1”*
 - Whereas the public register should always name the body concerned for any interests in external organisations, including businesses that trade for profit. For example, *“I am a board member of Abacus Housing Association Ltd”,* or *“I am the owner of Apex Contracts, a small building contracts company”*.
- 8.4 You should inform your head of department (employees) or the Chairperson and Director (governing body members) if there are any reasons why public disclosure of a particular relationship or interest would be inappropriate.

Code of Conduct extracts

Definition of 'close connection'

The following extracts from the codes of conduct for governing body members and for employees contain the following guidance on declarations relating to people you are “closely connected to”.

- 3.1 Someone 'closely connected' to you includes family members and persons who might reasonably be regarded as similar to family members even where there is no relationship by birth or in law.
- 3.2 As well as considering your own actions, you must be aware of the potential risk created by the actions of people to whom you are closely connected. Who you should consider, and our expectations of you to identify and declare such actions are outlined in the following table.

	Required Response
<p>1. Members of your household</p> <p>This includes:</p> <ul style="list-style-type: none"> • Anyone who normally lives as part of your household (whether related to you or otherwise) • Those who are part of your household but work or study away from home 	<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>2. Partner, Relatives and friends</p> <p>This includes:</p> <ul style="list-style-type: none"> • Your partner (if not part of your household) • Your relatives and their partners • Your partner's close relatives (i.e. parent, child, brother or sister) • Your close friends • Anyone you are dependent upon or who is dependent upon you • Acquaintances (such as neighbours, someone you know socially or business contacts/associates) 	<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>