



## Bridgewater Housing Association Policy

<b>Policy name</b>	Declaration of Interest
<b>Policy category</b>	Corporate (HR)
<b>Policy number</b>	CS10
<b>Date adopted</b>	12 <sup>th</sup> April 2023
<b>Last review</b>	2019
<b>This review</b>	2023
<b>Next review</b>	2026
<b>Equalities impact assessment required</b>	
<b>Links to other documents</b>	
<b>Consultation</b>	

## **1. INTRODUCTION**

Declarations of interest (DOI) can be raised by Bridgewater employees, Board members or prospective employee's / Board members. The procedures below outline the different types of DOI and how they should be managed. It should be noted that it is the policy of Bridgewater Housing Association that all board members should declare any interest at the start of any Board or committee meeting and leave the meeting when the issue is being discussed.

## **2. ANNUAL DECLARATION OF INTEREST PROCESS - STAFF**

- 2.1 On an annual basis, at the end of the financial year, the Office Administrator will issue a request to all staff to complete a Declaration of Interest Form [Appendix 1](#). At the same time as issuing the form, the Administrator will also distribute the approved businesses list, so that staff, when completing the form, can ensure that they declare their interest in any of our known businesses.
- 2.2 Once staff have completed their section of the form, they will then hand it to their line manager for sign off.
- 2.3 The line manager will review the form, and if there are any pre-existing declarations of interest noted on the form (i.e. those which have already been authorised), the manager will note any steps which are being taken to ensure this interest is managed and will sign off and return to the Administrator.
- 2.4 If there are any new declarations of interest made on the form, that the line manager was not previously aware of, the 'new declaration of interest procedure' as detailed below must be followed before the annual form can be signed off.
- 2.5 Line managers will return their completed forms to the Administrator.
- 2.6 The Administrator will then ensure that all declarations of interest are recorded on the Declaration of Interest Register. If the Administrator finds that any new declarations of interest have arisen, they should contact the line manager to ensure the new declaration of interest process is followed.

## **3. ANNUAL DECLARATION OF INTEREST PROCESS – BOARD MEMBERS**

- 3.1 On an annual basis, usually after the Annual General Meeting, the Office Administrator will issue a request to all Board Members to complete a Declaration of Interest Form. At the same time as issuing the form, the Administrator will also distribute the approved businesses list, so that Board members, when completing the form, can ensure that they declare their interest in any of our known businesses.
- 3.2 Once Board Members have completed their section of the form, the forms will be handed back to the Office Administrator and collated.
- 3.3 The Chair of the Board will review all Board Member forms, and if there are any declarations of interest noted on the form, the Chair will note any steps which are being taken to ensure this interest is managed, will sign off and return to the Office Administrator.
- 3.4 The Office Administrator will then ensure that all declarations of interest are recorded on the Declaration of Interest Register.

## **4. NEW DECLARATION OF INTEREST**

- 4.1 As per the types of DOI outlined in the policy, if any staff member finds they have a new declaration of interest, they must first of all notify their line manager.

4.2 The Line Manager will then refer to the Entitlements, Payments & Benefits Policy for initial guidance.

4.3 If permission is required in relation to the DOI, the line manager will complete the Declaration of Interest – Request for Approval Form – [Appendix 2](#). Information should be completed as follows:

- Date of request.
- Department Making the request – e.g. Technical.
- Name of Employee making the request – i.e. the existing member of staff affected.
- What is the Type of Declaration – e.g. my brother-in-law is tendering for a gardening contract, my daughter has applied for a home with the Association and has been shortlisted.
- When does this need to be approved by? – It may be that this needs to be dealt with quickly so we can offer someone a home to reduce void costs. Any time constraints should be noted on here.

4.4 The completed form will then be emailed to the Office Administrator or in their absence the Corporate Services Manager.

4.5 The Administrator will note on the form from whom we need permission for the interest.

4.6 The Administrator will then seek out the necessary permission and update the second section of the form. The DOI will be logged on the DOI Register and if approved, a link to the authorising email will be noted.

4.7 The Administrator will then notify the line manager of either the rejection or approval of the request.

4.8 The Line Manager will then ensure the employee who made the original DOI is notified.

## **5. DECLARATION OF INTEREST PROCEDURE – FROM JOB APPLICANTS**

5.1 On the front of the application form, new applicants are asked to declare any interest if they are in close relationship with a current member of staff, a Board Member, or they receive services (Factored Owner or Housing support ) from the Association.

5.2 The Office Administrator should check applications to ensure that any DOIs are highlighted at the shortlisting stage, so that if there are any major concerns, these can be addressed alongside the interview process.

5.3 If the job applicant is interviewed and becomes the preferred candidate for the role, the Office Administrator should follow the New Declaration of Interest Process. This will ensure that approval is given to their appointment and consideration is given to how we will manage any conflict of interest.

5.4 If the DOI is approved, the Office Administrator would update the DOI register and then the conclusion of the recruitment can then take place. **PLEASE NOTE THAT POSTS WILL BE OFFERED SUBJECT TO THE NEW DOI PROCEDURE BEING FOLLOWED AND ANY DECLARATION OF INTEREST BEING APPROVED.**

**BI - ANNUAL DECLARATION OF INTEREST FORM**

Surname and initials \_\_\_\_\_ (Please print)

Board Member / Employee – please delete as appropriate

Where based \_\_\_\_\_ (Employees only)

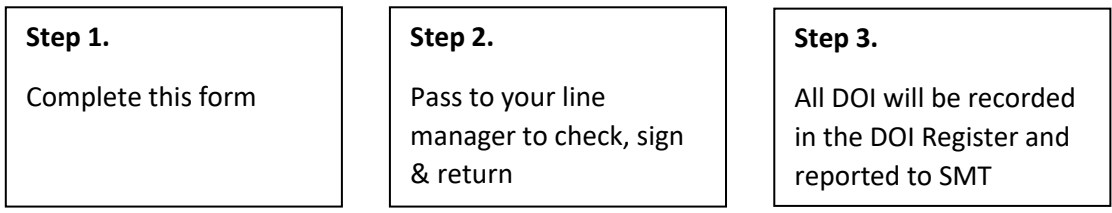
Job Title \_\_\_\_\_ (Employees only)

**To: All Employees and Board Members**

**Declaration of Interest (DOI)**

As per our Entitlements, Payments & Benefits policy, we have a legal duty under the Housing (Scotland) Act 2001 to ensure that our staff and Board members have no conflict of interest between their personal circumstances and the work of the Association.

**The Process;**



If your circumstances change during the year, it is your responsibility to tell us about a potential conflict of interest. Examples of these could be where you or a close friend, or family member:

- Is a tenant of Bridgewater?
- Receives Housing Support or Factoring Services from Bridgewater
- Is an employee or Board member of Bridgewater?
- Works with a supplier of goods or services for Bridgewater

For our protection and yours, we need to be clear that when we award contracts, we have not been influenced by friendship or family relationships. We also need to avoid any perception that there has been any influence in the award of these contracts from people we employ.

All staff who award contracts must declare any such connection with anyone who seeks to sell goods or services to us. This includes consultants, contractors and other suppliers. This is to ensure that your relationship with them does not influence whether or not suppliers or contractors are appointed. If you are in doubt, please ask for guidance.

This also includes appointing staff. If you are involved in recruitment to a post, you must declare any family connection or friendship with anyone applying for the post.

**STEP 1 - Please answer every question on this form.**

1. Are you a close relative of a member of staff, a Tenant of Bridgewater, a Housing Support Service User of Bridgewater, a Bridgewater Factored Owner, a Board member or someone who works for a third party providing direct services to Bridgewater or its customers?

Yes  No

If yes give the name of your close relative.....

Details of Relationship .....

Work position held by close relative.....

Does he/she work/live at the same work location as you? (Staff only).....

Is there a line management relationship between you and your relative? (Staff only).....

If yes, give details.....

**Note: A "close relative" is any relative by blood or marriage who is so close that there is a real risk of influence – for example a grandparent, grandchild, parent, child, brother, sister, uncle, aunt, nephew, niece, spouse, in laws or any other person who is closely related to**

**your family. The Scottish Housing Regulator expects the same principle to apply to people with a "close relationship" (e.g. those who are living together).**

2. In the **last year** have any of your family or friends worked for any organisation which sells goods or services to Bridgewater which may cause a conflict of interest? Or do they have a significant financial interest, for example a large shareholding in a private company which trades with us?

Yes  No

If yes please give particulars:

.....  
.....

3. Have you ever been employed in a private capacity by a customer of Bridgewater?

Yes  No

If yes, please give particulars:

.....  
.....

4. In the **last year** have you knowingly used or employed for private purposes any person or company who sells goods or services to Bridgewater?

Yes  No

If yes, please give details:

.....  
.....

5. More generally, please supply details of all bodies in which you have an interest which could have an influence on your role as an employee or Board member as:

- a Director or other officer of a business trading for profit, or
- an official or elected member of any statutory body

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6. Are you a tenant or Service User of Bridgewater?

Yes  No

If yes, please give your address.....

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**7. Personal Relationships**

Any personal relationships which develop between staff members, customers and Board members are not in themselves a breach of our policy. However, we need to avoid any conflict of interest that may arise from such a relationship. Examples might include line management, dealing with grievance or disciplinary matters, or anything else where having a relationship with someone might be thought to create a conflict of interest. In the case of tenants, it includes anything directly affecting their tenancy or in the case of Service Users it includes anything directly affecting the provision of their Care & Support.

You are therefore asked to declare any such relationship where a conflict of interest may arise.

Where a relationship is declared then Bridgewater will if possible make adjustments

to manage the perceived conflict of interest. When this is not possible, a decision will be made using the criteria outlined in the Entitlements, Payments & Benefits Policy to remove the perceived conflict of interest. Confidentiality and sensitivity will be observed in dealing with the above.

Please declare anything which relates to the above.

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8. Do you issue any contracts to organisations seeking to trade with Bridgewater which may be influenced by a personal relationship?

Yes  No

If yes please complete

Name of Business or individual who have been invited to tender.	
Name of Business or Individual to whom Contract may be/has been granted.	
Relationship to Business or Individual. Please give details of your interest and involvement.	

Signed ..... Date.....

**Staff** - please return this form to your **line manager** for review and signature, they will then forward to the Office Administrator.

**Board Members** – please return this form to the Office Administrator, who will then liaise with the Chair to review.

**STEP 2 Line Manager Review**

Is there a potential conflict of interest declared in this form? Yes  No

Please outline below the reason for this potential conflict, the discussion you have had with the employee and the actions that you have put in place to minimise the conflict.



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.....  
.....  
.....

Signed.....Dated.....

**SECTION TO BE COMPLETED BY Office Administrator**

**STEP 3 FOLLOW UP ACTION (including review of actions above)**

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Signed.....Dated.....

**STEP 4 - RECORDING IN THE DECLARATION OF INTEREST REGISTER**

Date Recorded in the DOI Register .....

Signed.....

**DECLARATION OF INTEREST - REQUEST FOR APPROVAL FORM**

**SECTION 1 – REQUESTING AUTHORISATION**

**DATE OF REQUEST**

**DEPARTMENT / AREA  
MAKING REQUEST**

**NAME OF EMPLOYEE /  
BOARD MEMBER MAKING  
DECLARATION**

**WHAT IS THE TYPE OF  
DECLARATION?**

**WHEN DOES THIS NEED TO  
BE APPROVED BY?**

**SECTION 2 – APPROVING THE DECLARED INTEREST**

**WHO SHOULD APPROVE THIS  
REQUEST?**

**APPROVED / REJECTED**

**DATE APPROVAL / REJECTION  
GRANTED**

**REASON FOR REJECTION  
IF APPLICABLE**

**HAS REQUESTEE BEEN  
NOTIFIED OF DECISION?**

**GOVERNANCE SIGN OFF**