

### Declaration of Interests Procedure

#### 1.0 Introduction

1.1 This procedure document should be read in conjunction with the Declaration of Interests Policy.

1.2 Board members, Committee Members, Employees and Involved Residents have a duty under common law to act in the best interests of The Wrekin Housing Group 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.

#### 2.0 Scope

2.1 This procedure applies to all Group employees, including those on temporary, agency or fixed term contracts, Board and Committee members and Involved Residents of The Wrekin Housing Group Limited (“the Group”) and its subsidiaries.

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

#### 3.0 Procedure statement

3.1 The purpose of this procedure is to ensure that potential conflicts are declared at the earliest opportunity and measures are in place for the management of the conflict.

3.2 Board and Committee Members, Employees and Involved Residents are required to promptly declare their, and those of any connected person(s), business interests and potential conflicts of interest and to update the Declaration of Interest Form on the LMS system should any changes arise and at least annually. Those without access to the LMS system should email the Governance Team to advise of any updates.

3.3 The NHF Code of Governance 2020 requires there to be a publicly available register for Board and Committee Members declarations of interest. Therefore, any declarations made by these members will be published on the Group’s website.

## 4.0 How will a conflict be managed?

### Board and Committee members

4.1 If a Board or Committee member believes that they have a real or perceived conflict of interest they should declare the interest at the earliest opportunity to the Group Chair and Company Secretary.

4.2 Instances of conflict will be managed on a case-by-case basis and in the event of the Board having to decide upon a question in which a Board member has an interest, all decisions will be made by vote with a simple majority. Interested parties will not be counted in the quorum or vote. The Board will consider:

- The nature and extent of the conflict;
- Actions taken to manage the conflict.

4.3 The Group Chair will discuss with the individual the Board's view of the conflict and how it will be managed. This may be:

- By ensuring that minutes and other documents relating to the item presenting a conflict are appropriately redacted;
- By the Board member leaving the meeting for the duration of the discussion / decision on the item which is the cause of the conflict;
- By ageing for what period of time the conflict is likely to occur and if this will have an impact on the Board's decision-making ability (e.g. impact on quorum);
- If the conflict is likely to be ongoing, which business interest is of priority to the individual.

4.4 In the event of the Group Chair having a conflict or potential conflict, the Group Chair will discuss how the conflict will be managed with the Chair of the Audit & Assurance Committee.

4.5 A side letter will be issued for Board or Committee Members who undertake work with other housing associations. The side letter will state that the Chair notes the Board Member's role in the sector and provides authorisation for this. The letter reminds the Board Member of their duties in regard to conflicts of interest and so the Board Member would still need to bear these duties in mind, including declaring a conflict of interest if one was to arise. A 'blanket' side letter will be issued for members who provide services to a number of housing associations.

### Employees, Involved Residents and others.

4.6 If an employee believes that they have a real or perceived conflict of interest they should declare the interest to the Company Secretary at the earliest opportunity. The conflict will be discussed with the line manager / HR for an employee and with the Customer Engagement and Feedback Manager for an involved resident.

4.7 For an employee, this may mean that the matter to which the conflict relates is dealt with by another employee, for example, a letting of a property / contract to a member of family or in a recruitment process.

4.8 For an involved resident, this may mean them removing themselves from a discussion in which either themselves or a member of their family is affected.

4.9 In all matters relating to conflicts, employees and involved residents are encouraged to demonstrate transparency in order to maintain the highest standards of probity and conduct.

### **Board Members, Committee Members, Employees and Involved Residents**

4.10 The Declaration of Interests Form can be found [here](#) on Sharepoint. When declaring an interest, the following should be provided, along with whether it applies to themselves, a member of their immediate family, spouse / partner, connected person or another close personal connection:

- A tenancy or leasehold matter;
- Employment matters;
- Business matters;
- Company directorships;
- Land or property;
- Membership of an organisation or society;
- Position of public responsibility.

4.11 Any queries relating to Declarations of Interests can be sent to the [Disclosures@wrekin.com](mailto:Disclosures@wrekin.com) inbox, which is monitored by the Governance Team.

### **Summary of changes table**

<b>Revision history</b>			
<b>Author</b>	<b>Summary of changes</b>	<b>Version</b>	<b>Authorised by &amp; date</b>
Catherine Rogerson	Policy separated from procedure and reviewed in line with review date.	1.0 April 2021	The Wrekin Housing Group Board – 7 <sup>th</sup> April 2021
Angelina Hicklin	Board Members procedure merged with Employees and Involved Residents procedure  Publication of Board and Committee Members Disclosure of Interest on the Group Website  Use of the LMS System to obtain DOI information	2.0 March 2024	The Wrekin Housing Group Board – 27 <sup>th</sup> March 2024