



Declarations of Interest Policy





1.0 Introduction

- 1.1 Housing Plus Group ('the Group') is committed to maintaining the highest standards of integrity, transparency and accountability. This Policy aims to prevent conflicts of interest and mitigate fraud risk by requiring full disclosure of any personal, financial, or business interests that could influence decision making 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 and any of its 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 s175 and S177 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 any proposed transaction or arrangement.
- 1.4 Non-Executive Directors and Trustees should ensure they meet the Fit and Proper Person Requirements of under regulation 5 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 Group's adopted Code of Conduct.

2.0 Policy Statement

- 2.1 Board and Committee Members, Employees and Involved Residents are required to promptly declare, and to use reasonable endeavours to confirm those of any 'connected person(s)', business interests and potential conflicts of interest. Declarations must cover financial interests, relationships with suppliers, subcontractors or competitors and any other circumstances that could create undue influence or fraud risk.
- 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 Members' declarations of interest which is reported on annually to the board.
- 2.4 The NHF Code of Conduct requires those covered by this policy at 3.1 below 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.



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, 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 stepbrother or stepsister) or any other relation by marriage.


5.0 Roles and Responsibilities

- 5.1 Those named in paragraphs 3.1 and 3.2 should ensure they act in accordance with the Group's policies, 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 and this should be updated when any changes arise. Board, Committee and Executive Management Team members should submit an annual declaration. Changes will be recorded in a secure Declaration of Interest Register held by the Governance Team and subject to audit and monitoring. Individuals are encouraged to report suspected fraud or undeclared interests through the organisation's whistleblowing channels.
- 5.3 Board and Committee Members must declare all external appointments, shareholdings and consultancy roles annually and update declarations immediately when changes occur. They 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.

	Policy Control Sheet Declaration of Interest Policy Policy reference number - 2026/009
Policy Author	Angelina Hicklin Governance Manager
Direct Lead	Suzanne Forster Chief Financial Officer and Company Secretary
Version	1.0 – April 2026
Target audience	Employees, Involved Residents, Board and Committee Members of the Group entities; Agency staff; Contractors; Consultants; Suppliers; Customers / service users, and Volunteers
Consultation	Executive Management Team Audit and Risk Committee
Date of Equality Impact Assessment	No individuals or groups of people are disadvantaged by the adoption of this policy the EIA was completed 3 rd March 2026.
Date of Data Privacy Impact Assessment	The information contained in this policy is low risk therefore no DPIA is required
Approving Body	The Group Board
Date of final approval	25 th March 2026
Implementation date	April 2026
Monitoring arrangements	Declaration of Interests Register Quarterly report to the Audit & Risk Committee
Reporting	Declaration of Interest Register reported to the Executive Team, the Audit and Risk Committee and Group Board.
Review date	October 2028
Expiry date	April 2029
Review cycle	3-year review cycle
Policy category	Corporate and Governance
Associated policies and procedures	Anti-Fraud, Bribery, Corruption and Money Laundering Policy Declaration of Interests Procedure Disciplinary Policy Gifts and Hospitality Policy Standing Orders Coterminous Board Policy
Policy location	SharePoint HPG Hub Housing Plus Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Angelina Hicklin, Governance Manager - Wrekin	Reviewed in line with review date and to produce a combined Policy for the Group incorporating RSM's recommended wording following the Prevention of Fraud Audit.	1.0 – April 2026	The Housing Plus Group Board – 25/03/2026