



Register of interests

Policy and Guidance

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Purpose

1. One of the core values of the Information Commissioner's Office (ICO) is to be—and to be seen as—independent and impartial from outside influence and self-interest. The Information Commissioner and ICO staff are dedicated to good practice and transparency in public office. The ICO has voluntarily adopted a Register of Interests ('ROI') scheme to achieve this.
2. The purpose of the Register of Interests is to identify those interests and activities which the Information Commissioner and ICO staff consider they should volunteer into the public arena because these interests and activities might reasonably be viewed as creating the risk of bias in carrying out their duties as the Information Commissioner and as ICO staff.
3. The Register of Interests will consist of copies of the completed Declaration of Interests Forms attached to this policy. The ICO office manager will be responsible for maintaining and updating the ROI.
4. The declaration of the Information Commissioner is proactively published and made accessible from the ICO website, www.ico.bm. The entire Registry of Interest is open for public inspection at our offices, Valerie T. Scott Building, 60 Reid Street, Hamilton HM12, during normal office hours.
5. The ROI will also assist the Information Commissioner, ICO staff, public authorities and the public in identifying any potential conflict of interest that might arise when an obligation, interest or distraction exists which could interfere with the Information Commissioner or the ICO staff's independent exercise of judgment in carrying out ICO duties and obligations.¹

Policy & Guidance

6. The Information Commissioner or office manager will ask each staff member to complete a Declaration of Interests Form upon the commencement of his or her position. The Information Commissioner and ICO staff will be required to review their forms annually. It is the responsibility of the Information Commissioner and her staff to make changes to their declaration on the Register whenever their interests change.
7. Temporary or relief staff assisting the Information Commissioner in fulfilling her mandate to conduct reviews or to engage in oversight of public authorities' compliance with the PATI Act will also be asked to complete a Declaration of Interests Form for inclusion in the ROI.
8. The categories of interest to be considered for registration are:
 - A. Remuneration

¹ Adapted from Government of Bermuda Financial Instructions 2013, Para. 3.3

- B. Related undertakings
- C. Property ownership
- D. Public appointments (paid or unpaid)
- E. Gifts and hospitality
- F. Close family links

9. Each category of interest listed on the form gives explanatory notes about the details required.
10. A form is required even if an individual has no registerable interests.
11. When declaring or registering an interest you should not qualify the amount of any financial interest, merely state that one exists.
12. In considering the appropriateness of registering an interest, an individual should ask whether a member of the public, acting reasonably and knowing the facts of the situation, might consider that any interests could potentially affect your responsibilities as, or to, the Information Commissioner, and to the public, or could influence your actions or decision-making.
13. The presumption is always in favour of declaring an interest. Advice should be sought from the Information Commissioner if there is uncertainty about whether an interest should be registered.
14. The Information Commissioner will take steps to resolve any potential conflicts of interest in a way which protects the public interest and aligns with her statutory mandate to promote public access to information.
15. The form should be signed, dated and submitted in hard copy to the ICO office manager.

Declaration of Interests Form (for inclusion on the ICO Register of Interests)

Full Name: _____ Position: _____

Category A – Remuneration	YES or NO	Details
<p><i>Do you hold any positions where you receive remuneration (pay, benefit or allowances) by virtue of being:</i></p> <p><i>Employed</i></p> <p><i>Self-employed</i></p> <p><i>Holder of an office</i></p> <p><i>Director of an undertaking</i></p> <p><i>Partner in a firm</i></p> <p><i>Undertaking a trade profession, vocation or any other work?</i></p>		<p>If yes, please give full details of the name of the employer/company/undertaking and the nature of the work or business and your job title or position. You do not need to register the amount of the remuneration.</p> <p>Remuneration you receive from a pension, as the Information Commissioner or as staff of the ICO, does not have to be included.</p>

Category B – Related Undertakings	YES or NO	Details
<p><i>Do you hold any directorships which are not remunerated but where the undertaking in question is a subsidiary or parent of an undertaking in which you are a remunerated director (as in Category A)?</i></p>		<p>If yes, give names of the subsidiary or parent company or other undertaking and the nature of its business and the relationship with the company or other undertaking in which you are a director and you receive remuneration.</p>

Category C – Property Ownership	YES or NO	Details
<p><i>Do you own or have any right or beneficial interest (including trusts) in houses, land and buildings, which may be significant to, or relevant to or bear upon the work and operation of the Information Commissioner's Office?</i></p>		<p>If yes, give details of all relevant rights or interests (legal or equitable).</p>

Category D – Public Appointments	YES or NO	Details
<p><i>Have you ever been appointed to work for or serve with any public authority (as defined under the Schedule to the PATI Act), either paid or unpaid?</i></p>		<p>If yes, state the names of the authority/body/board/council and the dates worked or served.</p>

Category E – Gifts and Hospitality	YES or NO	Details
<p><i>Have you or your spouse to your knowledge received any gifts or hospitality within your current term of office which in any way relates to your duties as, or for, the Information Commissioner?</i></p>		<p>If yes, you must give all relevant details, except:</p> <ul style="list-style-type: none"> • You are not required to register isolated gifts of a trivial character, the value of which must not exceed \$100. • Normal hospitality associated with your duties and which would reasonably be regarded as appropriate. • Gifts received on behalf of the Information Commissioner in her official capacity, i.e., conference mementos.

Category F – Close Family Links	YES or NO	Details
<p><i>Are there any relevant interests of close family members, i.e. individuals whose interests and relationship to you could potentially be reasonably interpreted as carrying a risk of bias in the conduct of the duties of the Information Commissioner or ICO’s staff? Close family members may include a spouse, domestic partner, parent, child or relative living in a common household.</i></p>		<p>If yes, please name the person and state the nature of the relationship.</p>

Category G – Other Interests or Activities	YES or NO	Details
<p><i>Any other interests or activities not covered by the above categories, such as with voluntary organisations or societies, that may be of relevance to, or bear upon, the work of the Information Commissioner?</i></p>		<p>If yes, please name the organisation and describe your role.</p>

I confirm that the above declaration is complete and correct to the best of my knowledge and belief.

Signature:

Date:

