Register of Interests Policy

April 2025

Purpose

1. One of the core values of the Information Commissioner's Office is to be—and seen to be—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 regime 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 self-volunteer in the public arena because these interests and activities might reasonably be viewed as creating a risk of bias in carrying out their duties.

3. The Register of Interests will 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 ICO staff member's independent exercise of judgment in carrying out the ICO's duties and obligations.[1]

4. The Register of Interests will consist of copies of the completed Declaration of Interests Forms, using the template appended to this policy. The Manager – Finance and Administration is responsible for maintaining and updating the ICO's Register of Interests.

5. The Declaration of Interests Forms completed by the Information Commissioner and the Deputy Information Commissioner, as well as by any other public officer carrying out delegated responsibilities, will be proactively published on the ICO's website, ico.bm. The entire Register of Interests is open for public inspection at our office, during normal business hours.

Policy

6. The Information Commissioner or Manager – Finance and Administration will ask each staff member to complete a Declaration of Interests Form at the start of their employment.

7. Declarations will be reviewed and updated annually by each officer, on or before the 15th day of April each year.

8. It is the individual responsibility of the Information Commissioner and each staff member to update their declaration whenever a material change to their interests arises outside the annual review period.

[1] The meaning for 'conflict of interest' has been adapted from the Government of Bermuda's *Financial Instructions* (as amended on 30 June 2018), at paragraphs 1.1 and 3.3.

9. Temporary or relief staff assisting the Information Commissioner in fulfilling the statutory mandate to conduct reviews or to engage in oversight of public authorities' compliance with the PATI Act will be required to complete a form for inclusion in the ICO's Register of Interests.

10. The categories of interests to be considered for declaration are:
    A. Remuneration
    B. Related undertakings
    C. Property ownership
    D. Public appointments (paid or unpaid)
    E. Gifts and hospitality
    F. Close family links
    G. Any other relevant interests or activities

11. Each category of interest listed on the form gives explanatory notes about the details required.

12. A form is required even if an individual has no registerable interests.

13. When declaring an interest, the officer is not expected to quantify the amount of any financial interest but merely to state that one exists.

14. In considering the appropriateness of declaring an interest, an individual should ask themselves whether a member of the public, acting reasonably and knowing the facts of the situation, might consider that any interest could potentially affect their responsibilities as, or to, the Information Commissioner (or an officer acting under the Information Commissioner's delegated authority), and to the public, or could influence their actions or decision making. This is meant to be an objective exercise for the officer to focus their mind in thinking about what an average person might consider to be a conflict or give the appearance of bias or the potential for favourable treatment.

15. 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 declared.

16. The Information Commissioner will take steps to resolve any potential conflicts of interest in a way that protects the public interest and aligns with the Commissioner's statutory mandate to promote and uphold public access to information.

17. Each Declaration of Interest Form should be filled in, signed, dated and submitted to the Manager – Finance and Administration within the expected timeframe.

Declaration of Interests Form

Name: _____ **Position:** _____

Category A – Remuneration	YES or NO	Details
Do you hold any positions where you receive remuneration (pay, benefit or allowances) by virtue of: • *being employed or self-employed* • *being a holder of an office* • *being a director of an undertaking* • *being a partner in a firm* • *undertaking a trade profession, vocation, or* • *any other work?*		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 state the amount of the remuneration. Remuneration you receive from a pension, as the Information Commissioner or as staff of the ICO, does not need to be included.

Category B – Related undertakings	YES or NO	Details
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)?		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. You do not need to state the amount of the remuneration.

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

Category D – Public appointments	YES or NO	Details
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?		If yes, state the name of the public authority **and** the start/end dates you worked or served with it.

Category E – Gifts and hospitality	YES or NO	Details
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?		If yes, you must give all relevant details, except that you are not required to declare: • isolated gifts of a trivial character, whose value does not exceed $100; • normal hospitality associated with your duties and which would reasonably be regarded as appropriate; or • gifts received on behalf of the Information Commissioner in their official capacity, e.g. conference mementos.

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

Category G – Other interests or activities	YES or NO	Details
Do you have any other interests or activities not covered by the above categories, such as with voluntary organisations or societies, which may be of relevance to or bear upon the work of the Information Commissioner?		If yes, please name the organisation **and** describe your role, with relevant dates.

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

Signature: _____ **Date:** _____

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