

Ofgem Declaration of Interest Policy and Guidance version 1.2 March 2023

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OFGEM DECLARATIONS OF INTEREST POLICY AND GUIDANCE

THE ESSENTIALS

- We should be known for our impartiality, integrity, and high professional standards. It must be clear to everyone that none of our decisions are influenced by private interests.
- The purpose of this policy is to protect the reputation of Ofgem and everyone working here. In the regular course of business, agents, and employees of Ofgem may have the opportunity to advance their own personal interests with or against the interests of Ofgem. Acting in such a manner is unacceptable and any party who acts outside of Ofgem's best interest may be subject to disciplinary action.
- This policy is designed to ensure that you understand when and how to declare a potential conflict of interest and that where potential conflicts may arise or be perceived to arise: these are dealt with in an appropriate and open manner.
- Please see the Appendices to this policy for guidance and examples relating to personal financial interests (including prohibited financial interests), personal relationship interests and political interests.

BACKGROUND: WHAT IS THE PURPOSE OF THIS POLICY?

1. As civil servants we must have, and be seen to have, high standards of honesty, impartiality, and integrity in the exercise of our duties. These are outlined in Seven Principles of Public Life. This is important for the protection and reputation of Ofgem and everyone working here. It must be clear to everyone that none of our decisions are unduly influenced by private interests.
2. To stop conflicts of interest, we impose some restrictions on everyone who works here, including members of the Gas and Electricity Markets Authority (GEMA). These restrictions are part of your contract and are repeated in the Civil Service Code. As well as affecting your time here, some of the rules cover future employment.
3. The purposes of this policy are:

- to communicate Ofgem's requirements and your obligations in relation to disclosing and resolving potential and / or actual conflicts of interest to communicate Ofgem's requirements and your obligations in relation to prohibited interests
 - to advise all those working for or on behalf of Ofgem / GEMA in any capacity of their obligation to resolve any disclosed conflicts of interest and maintain high ethical standards
 - to ensure that Ofgem / GEMA's regulatory decisions are made in line with our statutory duties.
4. ExCo has overall responsibility for ensuring this policy complies with GEMA's legal and ethical obligations, and that all those under its control comply with it. The Controls and Assurance Team Manager has primary and day-to-day responsibility for implementing this policy and monitoring its use and effectiveness. However, **everyone has a responsibility** to declare any potential conflict of interest. The resolution of any declared interest lies with the individual and their line manager and, where appropriate, others in Corporate Services and Legal teams.

SCOPE: WHO DOES THIS POLICY APPLY TO?

5. **This policy applies to, and must be followed by, all persons working for or on behalf of Ofgem / GEMA in any capacity, whether permanent, casual, fixed, agency staff and contractors.** This includes, but is not limited to, Authority and Committee Members, Executive Directors, Non-Executive Directors, employees and retained consultants acting on our behalf. Some of the rules in this policy also cover future employment. As explained below, **this policy also applies to dependents and potentially certain wider non-dependent relationships.**
6. Any Ofgem colleague who breaches this policy may face disciplinary action, which could result in dismissal. This policy and procedures will be reviewed at least every three years to take account of any new issues that emerge, and any complaints or comments received. General rules relating to conduct and disciplinary action are contained within your employment terms and conditions and on the [Ofgem Employee Essentials intranet pages](#).

Dependents

7. **This policy also applies to dependents, which means spouses, unmarried partners (including civil partners) and dependent children of Ofgem staff – anyone working for or on behalf of Ofgem in any capacity must identify, disclose, and resolve any financial or non-financial conflicts involving dependents.**
8. Failure to adequately resolve a dependent's conflicts may result in disciplinary action.
9. You must notify your Director and Controls and Assurance Team Manager if, for example, your dependent works for an energy company (including, but not limited to, regulated companies), major supplier or contractor to an energy company, or a company in the financial or technology sectors with significant interest in the energy sector. Please see the appendices to this policy for further guidance and examples relating to personal financial interests (including prohibited financial interests), personal relationship interests and political interests.

Non-dependents and wider relationships

10. Whilst specific provision is made within this policy for staff members and their dependents, staff should also be aware of potential conflicts that might arise involving non-dependent family, friends, and wider acquaintances. For example, being involved in a procurement exercise, a licence application or investigation involving a non-dependent family member or friend's business or employer. You must notify your Director and Controls and Assurance Team Manager of any conflict of this nature as soon as it arises.

WHAT IS A CONFLICT OF INTEREST?

When competing interests impair our ability to make **objective, unbiased professional decisions** we have a conflict of interest. A conflict of interest can occur in any situation where an individual or organisation can exploit a professional or official role for personal or other benefit. You have a conflict of interest if your commitment to Ofgem is compromised by the possibility of personal gain or gain for people you are close to – as explained above, this policy covers your friends and non-dependent family, as well as your dependents. **The**

person who stands to gain does not actually have to gain anything – the opportunity to benefit is itself a conflict of interest.

11. **Even the *perception* of competing interests, impaired judgement or undue influence can be a conflict of interest.** It is generally best practice, and in keeping with the [Civil Service Code](#), to not only avoid actual conflicts but to avoid the perception of conflicts. While there may be nothing improper happening, it is easier and simpler to avoid even the idea of a conflict, rather than having to undergo a time-consuming investigation to prove there was no conflict.

12. You may face a conflict of interest when your professional duties as an employee of Ofgem and your personal interests diverge. Those interests can be financial or non-financial; conflicts of interest may take various forms, including:
 - **financial interests** – e.g., holding shares in a market participant’s business or engaging in employment outside of Ofgem. Certain financial interests are absolutely prohibited – see Appendix 1
 - **relationship interests** – e.g., recruiting a close family member – see Appendix 2 for further guidance and examples of personal relationship interests
 - **political interests** – restrictions on civil servants taking part in political activities are set out in the [Civil Service Management Code](#), and all civil servants are subject to duties of political impartiality under the [Civil Service Code](#) – see Appendix 3 for further guidance and examples of political interests

13. It is not possible to define all situations or relationships which may create a conflict of interest, so each situation must be evaluated individually. **In all cases, it is your responsibility to assess the potential for conflict and whether it is a prohibited conflict or one which needs to be disclosed and resolved.** Failure to resolve a disclosed conflict could lead to disciplinary action.

Personal gain

14. Personal gain covers both financial and non-financial interest. Certain financial interests are absolutely prohibited – please see Appendix 1. A financial interest is anything that has a monetary value, including (but not limited to):

- pay
- commissions
- directorships
- consultancy fees
- equity interests e.g., shares
- forgiveness of debt
- property
- royalties
- intellectual property rights

In this type of example, through a decision made or influenced by the individual, or knowledge of that decision (usually prior to it entering the public domain), a staff member has gained financially through the trading of financial instruments, selling of knowledge, etc.

15. **Non-financial interests** include (but are not limited to):

- access to privileged information or facilities
- favourable treatment of an individual or company in return for a benefit, e.g., Ofgem procurement of services from an organisation that you are connected to - for instance, an organisation which your family member has a financial interest in, or that you may wish to work for in the future, or have worked for in the past
- favourable treatment of an individual or company because you previously worked for that individual or organisation, e.g., awarding a procurement contract to an organisation you have previously worked for, irrespective of financial benefit to you
- securing a favourable decision for a political party or other non-political body for personal enhancement within that organisation
- gifts or hospitality when in a non-Ofgem role, e.g., access to sporting events, functions, etc. related, or otherwise connected, to energy companies or the energy sector
- securing any of the above benefits for family or friends.

YOUR OBLIGATIONS: DISCLOSING CONFLICTS OF INTEREST

COMPLIANCE

16. **You must ensure that you read, understand, and comply with this policy, including the guidance in the appendices (where appropriate).** In all cases, it is your responsibility to assess the potential for conflict and whether it is a prohibited conflict or one which needs to be disclosed and resolved. Failure to resolve a disclosed conflict could lead to disciplinary action. You may require to seek direction on the matter from the Controls and Assurance Team Manager.
17. Briefings on this policy forms part of the induction process for all individuals who work for Ofgem, and awareness raising sessions for existing staff will be provided routinely.

DISCLOSURE OF POTENTIAL / ACTUAL CONFLICTS

18. Certain conflicts of interest are absolutely prohibited – see the Appendices to this policy. Other types of conflicts of interest may need to be disclosed. All disclosed conflicts of interest must be resolved. Failure to resolve conflicts may result in disciplinary action. By disclosing conflicts and being aware of and transparent about your conflict risks, you can ensure that Ofgem’s reputation and credibility as a public body are maintained.
19. Ofgem colleagues should not simply rely on any examples or lists set out in this guidance. Please see the Appendices below for guidance and examples to assist with your assessment.
20. You must disclose or seek direction on any issues which may potentially conflict with your responsibilities to Ofgem. It is the responsibility of Ofgem colleagues themselves to be alive to possible conflicts and, where they arise, to bring them to the attention of their Director and the Controls and Assurance Team Manager. You can use the ConflictsofInterest@ofgem.gov.uk mailbox to flag these.
21. If you are in any doubt as to whether a conflict of interest exists, discuss the situation with your Director or the Controls and Assurance Team Manager.

When do I disclose?

- 22. Your duty to disclose actual or potential conflicts of interest applies at all times, including:
- 23. when you begin working with Ofgem – as part of the recruitment process, every new Ofgem employee is provided with a copy of this policy and is asked to declare any potential conflicts of interest they may have.
- 24. as soon as you become aware of any change in your circumstances (or, for example, those of a close family member, if relevant) which requires you to update your Conflict of Interest disclosure position – for example, your position regarding your declared pension benefits may change when you start to receive pension payments from an already declared deferred pension.

How / where do I record my disclosure?

- 25. New joiners - if you are a new joiner, then you must read this guidance and complete and submit a declaration to HR. Any conflicts disclosed in that process will require to be resolved.
- 26. Existing staff - if you assess that you have any actual or potential conflicts of interest, you must (1) notify your Director; and (2) disclose the matter to the Controls and Assurance Team Manager for their consideration on next steps and resolution.
- 27. You will be required annually, to confirm your Conflict of Interest disclosure position is up to date. This confirmation shall be stored on your HR record.
- 28. As part of Ofgem's internal assurance and compliance functions you may also be contacted periodically by the Controls and Assurance Team Manager to verify, confirm, explain and / or update your Conflict of Interest disclosure position.
- 29. Whether or not you assess that you have a conflict requiring disclosure in accordance with this policy, you should keep records of your assessments and related research, discussions, resolutions, and conclusions.

YOUR OBLIGATIONS: RESOLVING CONFLICTS OF INTEREST

What happens when I disclose a conflict of interest?

30. Whether you are a new joiner or existing staff or Committee member, all declarations / disclosures in relation to conflict of interest will be received and processed in a confidential manner by the Controls and Assurance Team Manager.
31. Once the Controls and Assurance Team Manager has all the information, they will assess whether a conflict of interest exists. If there is one, they will also establish what to do about it, and set a timescale for action, depending on the materiality of the conflict. This process may involve HR and Legal input. Each declaration will be dealt with on its own merits and the endorsement of the Accounting Officer may be sought. All material conflicts will be reported to the Accounting Officer when they are identified.
32. The potential for conflict can depend on a number of circumstances, for example, the precise nature of any financial holding and the staff member's position in the organisation. We will adopt a proportionate, case by case approach taking account of the facts of the particular relationship, the nature of the interest, the closeness of the relationship and whether impartiality may be, or be perceived to be, undermined by the relationship.
33. All declarations will be reviewed by the Controls and Assurance Team Manager. If necessary further information will be sought from the staff member or appropriate others (for example, where advice may need to be sought on a particular company's activities).
34. The Controls and Assurance Team Manager will provide for each potential conflict an assessment of whether a conflict in fact exists, the appropriate remedy and the time period over which the action must be taken. Resolution of a conflict of interest will depend on the circumstances and type of interest disclosed. For example, you will not be permitted to engage in matters on behalf of Ofgem with organisations or individuals with which you have an interest. All decision making and engagement with the organisation or individuals concerned will be handled and managed independently.

35. You will be notified of the final decisions and actions required of them and the time span over which such actions should be taken. The standard timescales, which run from notification, are that any such action should be taken no later than 9 months, depending on the type of conflict of interest that is confirmed.

Appeals

36. If you disagree with the decision of The Controls and Assurance Team Manager, you may ask that the decision be reviewed. This review will be carried out by the Deputy Director of Finance, Procurement and Risk - Corporate Services. Deputy Director of Finance, Procurement and Risk - Corporate Services decision will, in all cases, be final.

Sanctions

37. ExCo regard the above arrangements as extremely important for the protection and reputation of Ofgem and its staff. Disciplinary action may be taken against any staff member who is found not to have complied with them (for Ofgem's disciplinary procedures, see "Formal disciplinary process" [here](#)).

APPENDIX 1 - PERSONAL FINANCIAL INTERESTS

A personal financial interest is either a direct or indirect financial interest, or a financial interest held by a commercial entity with which you have connections. **Where a personal financial interest amounts to a conflict, in some cases you may need to disclose (and thereafter resolve) and in other cases it is absolutely prohibited.** Even past shareholdings or other financial holdings / interests in energy or energy-related entities can raise concerns, as noted below. The following guidance and non-exhaustive list of examples are intended to illuminate the range of behaviours and actions that can fall within the definition of conflicts of interest. They are as diverse as the work settings in which they occur and involve people interaction, employee actions, and personal benefits taking precedence over what is in the best interests of the employer. To set out clearly the two sets of rules: **prohibited financial interests** on one hand, and **disclosable financial interests** (which must be resolved) on the other, you will see that this appendix includes:

- **rules on prohibited personal financial interests** – you cannot hold any such interests; and
- **guidance on other personal financial interests which you may or may not require to disclose depending on the circumstances**, e.g., personal financial interests in pension schemes, investment funds, share options, procurement exercises, previous employment, gifts and hospitality and participation (whether by yourself or people connected to you) in Ofgem administered environmental schemes. **In all cases, it is your responsibility to assess the potential for conflict and whether it is a prohibited conflict or one which needs to be disclosed and resolved in accordance with the Ofgem Conflicts of Interest Policy.**

PROHIBITED FINANCIAL INTERESTS: INTERESTS IN ENERGY-RELATED ENTITIES

Certain financial interests are absolutely prohibited:

- You **cannot** pursue any activity, hold any position or office with, or hold shares or other interests in a gas or electricity company.

- You **can** take part in pension funds or similar investment schemes that might hold shares in electricity or gas companies if you do not control the investment decisions. The “Third Package” of European Union directives¹ has some important rules on conflicts of interest at a national regulatory authority such as Ofgem / GEMA. Ofgem staff and those responsible for the management of GEMA are required to act independently from any market interest when carrying out regulatory tasks.

This means that GEMA is required to have rules in place to ensure it acts independently from the market interest (covering both the private and public sectors) and impartially in the exercise of its powers and fulfilment of its duties.

The European Commission’s interpretation² is that **this requirement prevents all staff (whether full time or part time) and the persons responsible for the management (directors, board members etc, whether full time or part time) from pursuing any activity or holding any position or office with an electricity or gas undertaking, and from holding shares or having any other interests in an electricity or gas undertaking.**

This obligation does not, however, prevent the persons concerned from taking part in e.g., pension funds or similar investment schemes that might among other things hold shares in electricity or gas undertakings.

If in doubt, seek guidance from the Controls and Assurance Team Manager who will consult the relevant colleagues, when required.

EXAMPLES OF FINANCIAL INTERESTS

We have included below various examples of potential financial conflicts of interest. "Interests" includes all securities, debt instruments and derivative products, such as:

- preference shares
- loan stocks
- bonds
- commercial paper
- bills of exchange
- convertibles
- warrants

- futures
- options
- contracts for difference
- spread-betting contracts.

Interests in energy companies

Conflicts will not just relate to the companies we regulate. You should declare if you hold any interest in a company whose primary business activity is linked to the energy industry. For example, other organisations that could be impacted by Ofgem decisions could include:

- UK energy companies that we do not regulate
- equipment suppliers to the electricity and gas industry
- overseas utility companies
- technology companies, e.g., those working in the renewables sector;
- financial institutions that may own, or hold significant financial positions in, energy companies
- companies tendering for Ofgem contracts (either to be working for Ofgem or as part of a scheme we are administering e.g., Offshore Transmission).

It is your responsibility to be aware of potential conflicts involving companies of this nature. Staff should in all cases declare ownership and seek advice as to the appropriate action.

Infrastructure and investment funds

You cannot invest in infrastructure, private equity, or pension funds where you manage the investment if they have or are likely to have investments in any companies licensed under the Gas or Electricity Acts. The same goes for organisations affiliated to these companies, such as parent groups and their other subsidiaries.

This does not include investment schemes where you have no influence over the investment decisions. Ofgem colleagues may have investments in assets which are held in collective investment schemes that hold “energy-related” investments. For example: unit trusts, investment trusts, unit linked policies, pension schemes (see below), or stocks and shares ISAs. Generally, these would not count as an “interest” because the investments are managed by an appropriately authorised person or organisation on a fully “discretionary” basis (where the fund manager makes all the decisions and you as the client have no

influence over those decisions and no direct ownership of the underlying investments). What is key is that it is **not you making the investment decisions**.

But it would be a potential conflict of interest if you had some control or influence over the investment decisions and the investments were “energy-related”. This would cover investment schemes that are specific to – or have a notable emphasis on – the energy sector.

You may not hold shares as a trustee or in a comparable representative capacity if you have primary responsibility for investment decisions.

Pension schemes

Ofgem’s Conflicts of Interest policy covers pension schemes if the investment decisions are made by the member of staff, or under instruction from them. Pension schemes can lead to conflicts of interest if you make or instruct the investment decisions. If the pension is managed without interaction from you, such as by a fund manager, there is no conflict of interest.

If you hold a pension from a period of employment with an entity which Ofgem regulates, you must declare it.

Share options

If work at a previous employer entitles you to exercise future share options in organisations that may lead to a conflict of interest, you must notify your Director, and the Controls and Assurance Team Manager of any such entitlements. See also: ***Previous employment*** and ***Procurement***.

Previous employment

Staff members should be careful in undertaking any work for Ofgem if it brings them into contact with organisations for which they have previously worked. This is particularly the case where financial transactions or allocation of work is involved – e.g., procurement contracts. You should declare any possible conflict of this nature immediately it arises. See also: ***Procurement*** and ***Share options***.

Procurement

Conflicts of interest can arise when Ofgem procures products or services. Ofgem’s Conflict of Interest policy covers staff involvement in procurement processes – both the procurement of products/services for use by Ofgem directly and those related to any area of policy, work or delivery administered by Ofgem.

It includes, for example, owning shares in companies that bid for tenders under the Offshore Transmission regime, if you are in a position to affect the outcome of that tender.

In all cases, you should be aware of Ofgem and wider Government procurement guidance in relation to conflicts of interest, and any potential conflicts that may affect them. Any such conflicts (potential or actual) should be declared immediately to your Director and the Controls and Assurance Team Manager See also: ***Previous employment*** and ***Share options***.

Environmental and fuel poverty schemes

You can participate in any [environmental scheme](#) that Ofgem administers. However, you should tell the Delivery and Schemes Director or a Delivery and Schemes Deputy Director and the Controls and Assurance Team Manager as soon as you intend to apply. You should also do this if you discover that you are connected to anyone who is a participant or who intends to apply – see Appendix 3 below on Personal Relationship Interests.

If you are applying to work at Ofgem and you are already a participant in a scheme (or know someone who is), you should declare this as part of your job application. The Resourcing Manager (People Team) will tell the relevant Delivery and Schemes Deputy Director about your declaration.

If you are not involved in administering the environmental or fuel poverty schemes, your declaration will still be noted.

If you are involved in scheme administration, we will use internal management controls to prevent you being involved in the assessment or management of a particular application or installation.

Gifts, hospitality, and expenses

You are prohibited from receiving gifts (cash or goods), hospitality or benefits of any kind from a third party if it could be seen to compromise your professional judgement or integrity. All Ofgem colleagues must abide by the [Ofgem Gifts and Hospitality](#) rules, which contain detailed guidance in relation to different types of gift and hospitality.

All Ofgem colleagues must also abide by the [Ofgem Expenses and Travel Policy](#) when claiming expenses.

APPENDIX 2 - PERSONAL RELATIONSHIP INTERESTS

As explained above, personal gain covers both financial and non-financial interest. Ofgem defines a **personal relationship interest** as a close relationship with any person or people who have financial or non-financial interests in Ofgem's work. For these purposes:

- "close" will usually mean a partner (or business partner or associate), family member, or any other person in a close personal relationship with an Ofgem colleague or could apply to work at Ofgem
- "interest" will usually mean that the person works for an energy company that we regulate. But it can also mean that the "close" person is a participant in one of the [environmental schemes](#) that we administer. All Ofgem colleagues, and persons connected to them, are permitted to participate in environmental schemes administered by us. You should inform the Director of Delivery and Schemes or one of the Delivery and Schemes Deputy Directors and the Controls and Assurance Team Manager (if a scheme is involved) if there is such a personal relationship. See also **Employment of relatives** and **Scheme participation** examples below.

When assessing personal relationship interests, Ofgem will adopt a proportionate, case by case approach taking account of the facts of the particular relationship, the nature of the interest, the closeness of the relationship and whether impartiality may be, or be perceived to be, undermined by the relationship.

Employment of relatives

Ofgem does not prohibit the employment of more than one member of a family. However, due to the potential for conflicts of interest, the appointment of an immediate relative of a current employee in the same area of Ofgem may cause problems with favouritism and employee morale. Such a situation must be raised with Controls and Assurance Team Manager in the first instance. In addition to potential claims of partiality in treatment at work, personal conflicts from outside the work environment can be carried into the day-to-day working relationships.

For these purposes an **immediate relative** is defined as a spouse, common law spouse, same sex partner, child, stepchild, sibling, parent, sibling-in-law, parent-in-law, grandparent, and grandchild.

Potential conflicts of interest may also arise in circumstances involving familial or intimate personal relationships; please discuss with the Controls and Assurance Team Manager.

Scheme participation

As noted above, all Ofgem colleagues, and persons connected to them, are permitted to participate in [environmental schemes](#) that we administer. You should inform the Director of Delivery and Schemes or one of the Delivery and Schemes Deputy Directors and the Controls and Assurance Team Manager if there is an existing personal relationship or if one arises.

It is also not unusual for our colleagues to know people within the energy industry or people who participant in one of these schemes. For example, you may know someone because of having worked with them previously or through some other personal, non-work relationship (a friend, flatmate, neighbour, or casual acquaintance for example). We wouldn't normally count those as "close" relationships.

You must, of course, always take care not to discuss Ofgem business outside of work where there's a risk of sensitive policy or commercial information, or personal data, being revealed.

APPENDIX 3 - POLITICAL INTERESTS

All Ofgem colleagues are civil servants and the public needs to be confident that our personal views do not interfere with our official duties.

Restrictions on civil servants taking part in political activities are set out in the [Civil Service Management Code](#), and all civil servants are subject to duties of political impartiality under the [Civil Service Code](#).

All Ofgem colleagues must comply with the Ofgem rules on Political Activity. Essentially, Ofgem colleagues at Band C or below can participate in most political activities with approval from Ofgem; Ofgem colleagues at Band D or above cannot take part in national political activities but may ask permission to take part in local activities. All members of staff, at any level, are entitled to be members of political parties. You do not need to declare this. This will not be viewed as constituting a conflict of interest if the requirements noted above, and in relevant guidance, are adhered to.

In addition to the restrictions on party political activity, Ofgem also applies restrictions on **non-party political activity**. These activities might include demonstrating on behalf of a pressure group, charity, or similar body; or representing to the media, or elsewhere, a pressure group, charity, or similar body.

If in doubt about what activities are political conflicts of interest you should raise with your Director and the Controls and Assurance Team Manager.

APPENDIX 4: ASSOCIATED DOCUMENTS AND FURTHER INFORMATION

- General rules relating to conduct and disciplinary action are contained within your employment terms and conditions and on the [Ofgem Employee Essentials intranet pages](#).
- Ofgem’s disciplinary procedures: see “Formal disciplinary process” [here](#)
- [Civil Service Code](#)
- [Civil Service Management Code](#)
- [Ofgem Anti-Fraud, Anti-Bribery and Corruption Policy](#)
- [Ofgem Gifts and Hospitality Rules](#)
- [Ofgem Expenses Rules](#)
- Ofgem guidance on [Price Sensitive Information: Identifying, Sharing and Publishing](#)
- [Ofgem Internal Whistleblowing procedure](#)
- [Ofgem values](#)
- [Ofgem Employee Essentials guidance on Political Activity](#)
- [Declaration and management of outside interests in the Civil Service](#)
- [Business appointment rules for Crown servants](#)

- [Declaration and management of outside interests in the Civil Service \(section4.2\)](#)

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0.3	2 June 2021	Text changes following feedback from Steph Broadribb and other internal stakeholders	Karen Boyle Head of Risk
0.4	11 June 2021	Text changes following review by ExCo on 9 June 21. Retitled Disclosure of interest policy; para 30 – confirmed	Karen Boyle Head of Risk

		material CoI will be reported to Accounting Officer; para 34 : timescal	
0.5	6 September 2021	Para 35 – appeals pathway amended from CEO to Dir of Corporate Services Reference to E-Serve changed to Delivery and Schemes	Karen Boyle Head of Risk
0.6	18 October 2022	Changed owner of this policy from Karen Boyle (Head of Risk) to Susan McMillan (Controls and Assurance Team Manager). Amended to have Controls and Assurance Team Manager job title referenced throughout. Amended Director of Corporate Services to Deputy Director of Finance, Procurement and Risk – Corporate	Cheryl Cameron Assistant Risk and Assurance Manager and Susan McMillan Controls and Assurance Team Manager

		Services to handle appeals. Updated hyperlinks to relevant pages.	
1.0	09/02/2023	Text amendment following feedback.	Cheryl Cameron Assistant Risk and Assurance Manager and Susan McMillan Controls and Assurance Team Manager
1.1	20/02/2023	Updated hyperlinks to relevant pages.	Cheryl Cameron Assistant Risk and Assurance Manager and Susan McMillan Controls and Assurance Team Manager
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