



# **YORKSHIRE BUILDING SOCIETY**

## **POLITICAL AND PUBLIC POLICY ENGAGEMENT POLICY OVERVIEW**

Updated December 2023

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## 1. Purpose

### The Purpose of the Policy

The Political and Public Policy Engagement Policy sets out the approach to lobbying taken by the Society and its representatives. This policy supports representatives of the society to carry out lobbying where we have a legitimate interest in a transparent, responsible, politically impartial way.

### Applicable Regulations and Legislation

- UK Lobbying Register
- Scottish Parliament Lobbying Register
- CIPR Code of Conduct
- PRCA Register of Consultant Lobbyists

### Requirements of the Policy

This policy requires representatives of the Society to follow defined standards for lobbying activity in all meetings with external political, public policy or civic stakeholders; to seek to ensure that third parties with whom the Society works on lobbying abide by similar standards; and to report details of meetings held with senior officials for external publication.

## 2. Scope

This policy applies to any employee or third-party representative of the Society when engaged in lobbying activity on behalf of the Society.

This policy excludes political or policy engagement undertaken in a personal capacity, by colleagues or third parties in their own time, where the Society does not have an interest.

This policy relates to external engagement with political, public policy or civic stakeholders; undertaken by representatives of the Society.

## 3. Definitions

- **Lobbying** - for the purposes of this policy, lobbying is defined as activity undertaken to engage with or influence government (UK-wide, devolved nations, regional and local), elected representatives, or civil servants in favour of the interests of the Society and its members and customers.
- **Engagements** - Can be written, verbal or in person.
- **Reportable Engagements** - Engagements undertaken on behalf of the Society with the following list of stakeholders:
  - Members of the UK Government, the Scottish Government, and the Welsh Government
  - Special Advisors to members of the above governments
  - Elected Members of the UK, Scottish and Welsh Parliaments
  - Elected Mayors and Leaders of UK local authorities
  - Permanent Secretaries of UK Civil Service departments

- **Representatives (of the Society)** - Colleagues and third-party organisations or individuals who conduct lobbying directly on the Society's behalf. For the purposes of this policy, this would not ordinarily include industry representative bodies.

## 4. Policy Statements

- The Society will not engage in lobbying activity unless it is in the legitimate interests of the Society and its members and customers, which will be determined by the Policy Owner.
- The Society will remain politically impartial and no political donations will be made by or on behalf of the Society. From time to time colleagues may need to incur expenditure with political parties or organisations to cover activities that are an accepted part of engaging with stakeholders, such as fees for attendance at political party conferences. These activities do not confer support for any political party or to influence public support for any party. Such requests for expenditure should be agreed in advance with the Senior Manager – External Affairs to ensure they do not constitute a political donation.
- Employees and third-party representatives of the Society will maintain the highest standards of professional endeavour, integrity, confidentiality, financial propriety and personal conduct and responsibility when undertaking lobbying activity; as well as being bound by the relevant standards set out in wider Group policies such as the Ethics Policy and Financial Crime Policy.
- Colleagues involved in political activity in a personal capacity are responsible for ensuring this is kept entirely separate from their duties as an employee and that YBS funds or resources (including time) are not used for political purposes.
- Those undertaking lobbying activity on behalf of the Society will be responsible for ensuring they and the Society comply with all local laws regarding the disclosure of lobbying activity and expenditure. The Public Affairs Lead will provide advice on how to maintain compliance.
- A register of Reportable Engagements will be compiled by the Public Affairs Lead and published on the Society's website on a monthly basis. Those engaged in lobbying are responsible for promptly declaring the required details of Reportable Engagements to the Public Affairs Lead.
- Any hospitality given and/or received will be declared internally.
- A summary of all Reportable Engagements and hospitality will be shared with the Board on an annual basis.
- Where representatives of the Society are due to be engaged in lobbying activity in collaboration with third parties, they will seek to ensure that those third parties abide by similar ethical standards on lobbying. Advice will be sought from the Public Affairs Lead if necessary.
- Only colleagues who have completed relevant training arranged by External Affairs and are on its list of approved spokespeople can lobby on behalf of the Society.
- Unless you have received training organised by External Affairs and are an approved spokesperson you are not allowed to lobby on behalf of the YBS Group.
- Training will usually only be provided to senior leaders or senior business experts. Requests for media training must be made to External Affairs.
- An up-to-date list of approved spokespeople and their relevant subject areas is maintained by External Affairs.



- Representatives of the Group presenting at public external events, such as conferences or seminars, which involve audience or moderator Q&A sessions should be aware of the potential risk posed by their words, especially if policy makers are present.
- Anyone who wishes to proactively lobby policy makers must contact External Affairs.
- YBS holds membership of a number of trade associations or industry groups, some of which may engage with political stakeholders on topics that are of relevance to our business. YBS or its subsidiary, Accord Mortgages, holds membership of the following bodies:
  - Building Societies Association
  - City of London Corporation
  - Intermediary Mortgage Lenders Association
  - Financial Intermediary and Broker Association
  - ISBA
  - National Association of Commercial Finance Brokers
  - TheCityUK
  - UK Finance
  - West and North Yorkshire Chamber of Commerce

## 5. Implementation and Monitoring

### Implementation

A copy of the policy document will be made available on the Policy page of the Society's Intranet and shared with third parties who may be involved in lobbying activity on the Society's behalf.

A version of the policy document will be published on the Society's external website, alongside a register of Reportable Engagements which will be updated monthly.

### Monitoring

The Public Affairs Lead will manage engagement with the Policy by relevant stakeholders, including those who undertake or may undertake lobbying activity on the Society's behalf. Such engagement will stress the importance of compliance with the Policy.

Employees and representatives of the Society are individually responsible for maintaining compliance with the principles and controls outlined in the Policy. This includes responsibility for the reporting of lobbying activities to the Public Affairs Lead. Any concerns can be raised via the Society's Whistleblowing Process or [Customer Complaints Process](#).

Non-compliance will be reported to the Policy Sponsor.

## 6. Approval

YBS Executive Committee is responsible for approving the policy.

It will be reviewed and re-approved on an annual basis.

## Appendix 1: Description of roles and responsibilities

### All representatives of the Society engaged in lobbying activity

Any colleague or representative of the Society who engages in lobbying activity on the Society's behalf is responsible for:

- Understanding the principles, standards and controls set out in the Policy
- Adherence to those principles, standards, and controls
- Reporting details of all lobbying engagement to the Policy Owner.

### Policy Owner

The Policy Owner is responsible for:

- Writing the policy document and ensuring that it always remains up to date.
- Reviewing the policy periodically and in the event of any significant change (e.g., legislative, regulatory, organisational, operational etc.).
- Seeking approval / reapproval from the Policy Sponsor and the relevant governance committee.
- Communicating the policy to all affected colleagues, ensuring that adequate supporting training is developed and delivered as required.
- Monitoring the application of the policy and escalating to the Policy Sponsor any breach in policy.

### Policy Sponsor

The Policy sponsor is accountable for all aspects of the policy.

The Policy Sponsor is responsible for:

- Providing direction to the Policy owner as required.
- Supporting the Policy owner in discharging their responsibilities, specifically ensuring sufficient investment is made available to enable implementation and monitoring of policy adherence.
- Endorsing the Policy prior to it being submitted to the relevant governance committee for approval.

### Group Responsibilities

- **R = Responsible:** The colleague who does the work.
- **A = Accountable:** The colleague who signs off the activity being completed. Note, each column needs an "A".
- **C = Consulted:** Anyone who should be involved in discussions and whose views should be listened to, prior to a decision being made and/or the task being completed.
- **I = Informed:** Anyone who must be told when a decision is made, or work is completed.



Who	Develop and maintain policy	Communicate the policy	Monitor adherence to the policy	Manage policy dispensations	Endorse the policy	Gain policy approval
Policy owner - Public Affairs Lead	R	R	R	R	-	R
Policy sponsor	A	A	A	A	R	A
Senior Manager - External Affairs	C	C	C	A	-	-
Senior Manager - Social Purpose and Sustainability	C	C	C	C	-	-
Executive Committee	-	-	-	-	A	-
YBS Board	-	-	-	-	I	-
All colleagues	I	I	I	-	-	-