

# **Conflict of Interest Policy and Procedure**

**Standing in the Gap. Registered charity no: 1174627**

Postal address: Ferndown House, Milton Road, Bloxham, Banbury, Ox15 4HD

[www.sitgap.org](http://www.sitgap.org)

## **Policy & procedure for Trustee Board and staff**

All trustees and staff of Standing in the Gap will strive to avoid any conflict of interest between the interests of the charity on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

A conflict of interest is any situation in which a trustee's/ staff members personal interests or loyalties could, or could be seen to, prevent the trustee/ staff member from making a decision only in the best interests of the charity.

The purposes of this policy is to protect the integrity of the charity's decision-making process, to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of trustees and staff. Volunteers to Standing in the Gap are covered in a separate volunteer policy.

### **Examples of conflicts of interest include:**

- A trustee who is also a user who must decide whether fees from users should be increased.
- A trustee who is related to a member of staff and there is decision to be taken on staff pay and/or conditions.
- A trustee who is also on the board of another organisation that is competing for the same funding.
- A trustee who has shares in a business that may be awarded a contract to do work or provide services for the organisation.
- This policy is meant to supplement good judgment, and staff, volunteers and trustees should respect its spirit as well as its wording.

### **Principles**

- Trustees are appointed to the Trustee Board to serve the interests of Standing in the Gap

- Members of the Standing in the Gap Trustee Board should act in the charity's interests only and without regard to their own private interests and should not derive any personal benefit or gain from the charity.
- Trustees have a personal responsibility to declare conflicts of interest in order to fulfil their legal duty to act only in the best interests of the charity
- Organisations or bodies with which Trustees are associated should not benefit from their membership of the Board, other than the benefits that all, organisations or bodies can receive from Standing in the Gap and its work.
- Staff are employed to serve the interests of Standing in the Gap
- Organisations or bodies with which staff members are associated in a personal capacity should not benefit from this employment, other than the benefits that all, or significant groups of organisations or bodies can receive from Standing in the Gap and its work.

### Register of Interests

- All Trustees and staff on appointment are required to list in a Register (Appendix 1) all relevant interests, such as relationships and posts held, which might influence their judgement or which could be perceived (by a reasonable member of the public) to do so. This written disclosure will be kept on file and will be updated as appropriate.
- All trustees and staff to update their Register entry annually, but it is the responsibility of all trustees and staff to notify the Chair of Trustees of all updates as and when they arise. The Register of Interests shall be open to reasonable public inspection on application to the chair of trustees.

### Declarations of interest at Standing in the Gap Trustee Board meetings

- All trustees and staff present at a board meeting (or sub-committee or working group) should make an oral declaration of any relevant interest if it relates specifically to a particular issue under consideration. Oral declarations should be recorded in the minutes of the meeting.
- If the outcome of any discussion at a board meeting (or sub-committee or working group) could have a direct financial effect on a trustee or an executive board member they should not participate in the discussion or determination of matters and should withdraw from the meeting. Withdrawals shall be recorded in the minutes of the meeting.
- If a trustee has any other interest which does not create a real danger of bias, but which might reasonably cause others to think it could influence their decision, they should declare the nature of the interest within the meeting. Following this, depending on the decision from the Chair they may remain in the room, participate in the discussion, and vote if they wish. The decision will be documented in the minutes of the meeting.

### Representation

- Trustees and staff attending meetings and conferences on behalf of Standing in the Gap should at all times act and speak in the best interests of Standing in the Gap, following the agreed policy of Standing in the Gap.

- Trustees and staff attending meetings and conferences in a personal capacity, or on behalf of a voluntary or community organisation or other body, may at times be able to usefully support the best interests of Standing in the Gap. In such circumstances they should make it clear in which capacity they are acting or speaking.
- Trustees and staff who may be placed in any conflict of interest while attending meetings and conferences should discuss their concerns at the earliest possible opportunity with the Clinical Director or Chair of trustees.

### Staff Conflict of Interest

- Staff should declare if they are concerned or interested in any other business or activity in Oxfordshire of a similar nature to or competitive with that carried on by Standing in the Gap.
- Staff should seek advice from the Clinical Director and Chair of Trustees regarding any activities, investments or associations which might interfere with their independent exercise of judgement in Standing in the Gap's best interest.
- Staff should declare any formal Trustee Board/Management Committee/Company Director positions with Oxfordshire voluntary organisations and any required action agreed and documented with the involvement of the Clinical Director and Chair of Trustees.
- Staff may not accept, directly or through a member of their immediate family, any gratuitous payment, loan at other than at fair market rate, service or gift, accommodation of value from any other party doing or seeking to do business with Standing in the Gap.
- All offers of gifts will be politely declined unless this is likely to cause offence. In any event, all offers of gifts, even if trivial, will be reported to the line manager.

Any exceptions, or potential exceptions, to this policy must be discussed at an appropriate meeting of the Board of Trustees of Standing in the Gap

**This policy is to be read in conjunction with the following policies and documents:**

- Confidentiality
- Code of Conduct for Trustees/ Employees and Volunteers
- Volunteer policy



## Appendix 1: Register of Interests

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All Trustees and staff are required to list in the Standing in the Gap Register of Interests all relevant interests which might influence their judgement or which could be perceived (by a reasonable member of the public) to do so.

Name:

Role in Standing in the Gap:      Trustee       Staff member

1. Relevant personal direct and indirect financial and non-financial interests, including those which arise from employment, membership, trusteeship or other association with voluntary or community organisations, public authorities, commercial organisations or other bodies.

2. Relevant direct and indirect financial and non-financial interests of close family members of which Trustees or staff could reasonably be expected to be aware (please state name of family member and their relationship to you).

Standing in the Gap has a data protection policy and procedures to ensure that it follows best practice and complies with legislation in its use of data. The information given on this form will be used only by those involved in the Register process. The information will be destroyed within 5 years. We will treat your completion of this form as consent for the information to be used in this way.

I certify that to the best of my knowledge the above information is correct.

Name:

Signature:

Date: