



Conflicts of Interest Policy – Staff and Volunteers

Revision	Author	Reviewed by	Date	Approved by	Date
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Conflicts of Interest Policy – Staff and Volunteers

1. Introduction

The purpose of this policy is to protect the integrity of RBLI's decision-making process, to enable stakeholders to have confidence in the organisation's integrity, and to protect the integrity and reputation of staff and volunteers.

All staff and volunteers of RBLI will strive to avoid any conflict of interest between the interests of the organisation on the one hand, and personal, professional, and business interests on the other. This includes avoiding both actual and perceived of conflicts of interest.

2. Statement of Intent

RBLI is committed to ensuring its decisions and decision-making processes are, and are seen to be, free from personal bias and do not unfairly favour any individual connected with the charity.

3. Scope

This Policy is applicable for all staff and volunteers within RBLI.

4. Conflicts of Interest

A conflict of interest is any situation in which a member of staff or volunteers' business or personal interests (or those of a person 'connected to' the member of staff or volunteer), or loyalty that they owe to another organisation or person, may or may appear to influence or affect their decision making and actions.

A person 'connected to' a member of staff or volunteer includes spouse, child, parent, civil partner or other relative, any person living with the member of staff or volunteer as their partner, a business partner or an institution controlled by the member of staff or volunteer or person 'connected to' the member of staff or volunteer.

5. Identification of Conflicts of Interest

A member of staff or volunteers' interests might include a role or investment in a company, partnership or other business, a paid role at another charity or any benefit they may receive from an entity contracting with RBLI. The interests of a connected person must be treated as an interest of that Trustee.

Examples of conflicts of interest and loyalty include, although not limited to:

- Indirect financial gain, such as employment by the charity of a spouse or partner, where their finances are interdependent;
- Non-financial gain, such as when a user of the charity's services is also an employee or volunteer;
- Being related to a member of staff and being involved in the process for deciding pay rises;
- Unfairly benefitting a beneficiary or potential beneficiary to whom they are 'connected to';

- Discriminating against a beneficiary based on own views or beliefs;
- Involvement with a business which supplies or works with RBLI (or is seeking to contract with RBLI); and
- Being a Trustee of another charity directly competing for funding with RBLI.

6. Declaring and Recording Conflicts of Interest

Members of staff and volunteers have a personal responsibility to declare conflicts of interest. Each member of staff and volunteers will make a full written disclosure of interests on appointment, which will be updated annually and when any material changes occur. The template used for these disclosures is included in Appendix 1. This information will be used to create a *'Register of Interests'*, the template for which can be found in Appendix 2.

At the start of and during the course of any meeting members of staff and volunteers must declare any interests in a transaction or decisions where there may be a conflict between the charity's best interest and that of the member of staff or volunteer. Declarations of interests must be clearly identified within the minutes of the meeting, including any need to withdraw and reasons for not doing so.

Staff and volunteers who have an interest that potentially could conflict with their position with RBLI should bring it to the attention of their line manager as soon as it becomes apparent. Senior managers with a potential conflict of interest should inform the Chief Executive. The Chief Executive should inform the Chair of Trustees.

Most conflicts of interest can be successfully managed if they are known and out in the open.

Members of staff and volunteers must also declare any gifts or hospitality offered and received in connection with their role at RBLI. There is a separate Gifts & Hospitality Policy, which should also be referred to.

7. Dealing with Conflicts of Interest

If a member of staff or volunteer believes that there is or might appear to be a conflict of interest this should be declared at the earliest opportunity. Thereafter the relevant person must withdraw from any discussions, decisions or votes relating to the conflict in question.

The conflict of interest may be allowed under the circumstances that apply where it is considered in the best interests of the charity to do so. This decision must be made by those who have no conflict of interest in the matter in line with the following:

- Where the conflict relates to the Chief Executive authorisation comes from the Board of Trustees.
- Where the conflict relates to a Senior Manager (Director) authorisation comes from the Chief Executive.
- Where the conflict relates to a Manager authorisation comes from the relevant Divisional Director.
- Where the conflict relates to a member of staff authorisation comes from the relevant Manager.
- Where the conflict relates to a volunteer authorisation comes from the Volunteers' Manager.

- The member of staff or volunteer who has declared the conflict of interest withdraws from any part of a meeting at which there is discussion of any arrangement or transaction affecting the other organisation or person.
- In relation to the point above any such disclosure and the subsequent actions taken will be noted in the minutes.

A separate guidance document, '*Conflicts of Interest – Guidance for Managers*', has been prepared for managers in relation to this.

8. Responsibilities

Senior Managers

Senior managers (directors) have delegated responsibility for implementing governance policies and procedures within RBLI. They must ensure that procedures are in place to capture and highlight potential conflicts of interest and that these are managed in accordance with this policy.

Senior managers, as with all members of staff, have a personal responsibility to disclose any interests in a transaction or decision where there may be a conflict between the organisations' best interests and their own.

Managers

Managers, as with all members of staff, have a personal responsibility to disclose any interests in a transaction or decision where there may be a conflict between the organisations' best interests and their own.

Managers are also responsible for managing potential conflicts that arise for their staff and volunteers. The additional guidance document, '*Conflicts of Interest – Guidance for Managers*' provides more detail in relation to managers' roles and responsibilities and should be referred to as necessary.

Employees and volunteers

All employees and volunteers should be aware of, understand and comply with this policy. As such they have a personal responsibility to disclose any interests in a transaction or decision where there may be a conflict between the organisations' best interests and their own.

9. Breach of Policy

Failure to disclose or deal transparently with a potential conflict of interest could have a negative reputational impact on RBLI. Such situations can also lead to an investigation by the Charity Commission or other regulators.

Non-compliance with this policy by employees may result in disciplinary action, up to and including summary dismissal.

10. Data Protection

The information provided in declarations of interests will be processed in accordance with the relevant Data Protection Legislation.

Appendix 1 –Declaration of Interests of Staff and Volunteers of RBLI (Template)

Name		
Position		
Item	Details	
Current employment and any previous in which you continue to have a financial interest		
Appointments – voluntary or otherwise e.g. trusteeships		
Membership of any professional bodies, special interest groups or mutual support organisations		
Investments in unlisted companies, partnerships and other forms of business, major shareholdings and beneficial interests		
Gifts or hospitality offered by external bodies in the last 12 months	<i>Note: this section applies to annual updates only and not the return on appointment as employee or volunteer</i>	
Do you use or care for someone who uses the organisations services?		
Any contractual relationship with the charity?		
Any other conflicts not covered by the above?		
Signature		
Date		

Signature

Appendix 2 –Register of Interests for Staff and Volunteers of RBLI (Template)

Name	Position	Description of interest (if none state none)*	Does the interest relate to the employee / volunteer or to a connected person	Name and address of other organisation	Nature of organisation	Start date of interest	End date of interest (if not current)

***Examples: employment, director / trustee or other appointment, office, membership, investment or other commercial interest or relationship, gifts or hospitality offered to the trustee, use of charity service**