

# CONFLICTS OF INTEREST POLICY AND PROCEDURES



Last reviewed: March 2022

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The objective of this policy is to help staff and volunteers avoid conflicts of interest (actual, potential and perceived) and to act appropriately where a potential conflict of interest does arise. It should be read alongside the anti-bribery and corruption policy, and the procurement policy. Trustees should also consult the Governance Manual.

## Principles

A conflict of interest or loyalty arises when a member of staff's personal interests or loyalties (or loyalties to another organisation), and the interests or loyalties which they owe to Integrity Action arise at the same time.

Interests can be:

- financial e.g. selling an asset to the charity or
- non-financial e.g. if a member of staff benefits from the services of the charity,

and either:

- direct i.e. when the benefit accrues to the individual; or
- indirect i.e. when the benefit accrues to a close family member or other associate of the staff member.

In assessing whether a conflict of interest exists you must be alert to situations in which there may be an appearance of a conflict of interest to an outside party even if you yourself do not consider there to be an actual conflict of interest.

## Procedures for managing a conflict

A conflict is managed in three ways:

- A conflict (actual, potential or perceived) should be declared at the earliest opportunity (to the Board, your manager or a member of SMT as appropriate).
- If someone declares an interest the CEO/Board must agree with that person how to deal with the conflict.
- The process must be fully documented, including the nature and extent of the conflict, the discussions/considerations taken into account and the actions taken to manage the conflict.

If you believe that another member of staff may have a conflict of interest, you must highlight your concerns to the individual and the CEO as soon as possible.

If the matter is not resolved to your satisfaction you should notify the Board in line with our Whistleblowing policy.

## Related policies

Anti-bribery and corruption policy      Related parties declaration for trustees and SMT  
Finance policies and procedures (which includes the procurement policy)  
Governance manual (for trustees)      Whistleblowing policy