



Statement and Policy adopted by the Trust Board (date)

Review of Statement and Policy due November 2024

Stratherrick and Foyers Community Trust, Conflicts of Interest Policy Draft 05 DEC 2022 v1

Reviewed 21/11/2023

Avoiding and declaring Conflicts of Interest for Employees and Volunteers

The purpose of this Policy Statement is to accept that conflicts of interest may occur and to provide a framework to recognise and report them, and take steps which will protect the Trust and the employee or employees concerned.

Employees of the Trust and those volunteering in a non-directorial role* require to adhere to the Seven Principles of Public Life. These are particularly important when dealing with procuring services or buying products. In a small community there is always the possibility of inadvertently providing work for friends or relatives which result in their financial gain and which may then put that supplier under a perceived obligation to the employee or volunteer who is acting for the Trust.

Selflessness

The employee must act in the interest of the Trust and its beneficiaries.

Integrity

Every employee must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends, or any group of which they are part. They must declare and resolve any interests and relationships themselves and not wait for this to be recognised by their line manager or members of the Trust. In a small community there will be familial and business relationships, however should a conflict of interest appear possible, the employee should discuss the issue with their line manager or the CEO at the first opportunity.

Objectivity

Each employee must act without regard to their own personal opinions. Decisions should be taken impartially and on merit using the best evidence available and without discrimination and bias. In tendering situations, no one prospective tenderer should be favoured with additional help or information.

Accountability

All employees are accountable for the decisions they make. Line managers, the CEO and Trust Board may require an employee to explain why a decision was made at whatever level. Employees should not take decisions which are inappropriate to that employee's role and responsibilities.

Openness

Decisions made by employees, either individually or collectively, must be able to be communicated to the Membership of the Trust. For example, should a cogent question on a particular matter be raised by a Member of the Trust or at an AGM, employees should expect to be required to account for that decision, either directly or via the CEO.

Stratherrick and Foyers Community Trust, Declaration of Interest Policy Draft 2022

Honesty

Employees are expected to be truthful in their actions and responses. They should consider if their actions may be perceived as benefiting themselves and if so, take appropriate action or contact the CEO for advice.

Leadership

Employees should lead by example and declare to their line manager / CEO as soon as they feel their position may be compromised by a decision they have made, or any offer of inducement or personal gain made by prospective suppliers to the Trust.

If an employee becomes aware of a situation where personal interests of other staff, volunteers or Directors are possibly problematic they should contact the CEO or the Chair of the Trust without delay. If either or both post-holders are involved, then the next senior director should be informed.

Declarations of Interest.

Declaring the interest

Remember that a conflict of interest may arise at any time.

Example 1.

If an employee's close relative is the chosen contractor for a new Trust funded project, the CEO should be made aware of this. The CEO will then either note this or take steps to protect the Trust and the employee from any problems which could otherwise arise.

Avoiding a difficult situation and perceived conflict of interest

Staff members may be asked to take over roles of an employee who may be compromised or considered to be at risk of the perception of having a conflict of interest.

Example 2.

It may be appropriate for a member of staff to distance themselves from a particular contract because of possible or perceived conflict of interest and for their role to be assumed by a different member of staff who has no such relationship. The CEO will advise on this.

Gifts and Incentives

Employees may not accept gifts, incentives or promises in return for business from the Trust. It is acceptable for Trust employees to receive teas, coffee and light refreshments on occasion from contractors, especially when on project planning or site visits. Trust employees should not accept any full meal, alcohol, gift or hospitality beyond this. If a supplier is offering bribes or incentives, then this should be reported to the CEO without delay.

Offers of secondary employment or 'Second Jobs'

It is incompatible for employees of the Trust to be employed by businesses, or be a partner, hold shares or investments, or be a substantial creditor in a firm which is a major contractor or supplier to the Trust, or of organisations which receive substantial grant funding from the Trust.

Example 3.

If a business or business interest connected with the Trust offers a current employee a 'second job' or contract work whilst that employee remains a member of Trust staff, then that offer should be declined until the proposal is discussed by the staff member and CEO. In general, it is not acceptable for a member of staff to work for both a contractor to the Trust and the Trust itself at the same time.

Summary

Employees and volunteers acting for the Trust in a non-directorial role must remain constantly vigilant to avoid conflicts of interest, possible conflicts of interest, possible perceived conflicts of interest or similar circumstances where the reputation of the Trust could be compromised, and take appropriate action without delay. Disciplinary action against employees is possible.

*Note – A Code of Conduct for Directors of the Trust is a separate document.

Further reading - [The Seven Principles of Public Life - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/the-seven-principles-of-public-life)