



Version	Date	Author	Rationale
1.0	27 October 2020		Approved by Board
1.0	September 2023		Reviewed by HR Consultant
1.1	October 2023		Due for review by HR Group Oct 2023, ratification at Board Oct 2023
2.0	October 2023		Reviewed by HR Group, ratified by Board Oct 2023

Conflict of Interest Policy

- 1 All staff, volunteers, and Trustees of NAVCA 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.

- 2 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 volunteers, staff and committee members.

- 3 Examples of conflicts of interest include:**
 - A Trustee who is also a member and has a role in deciding whether fees from members should be increased.
 - A Trustee or senior manager who is related to a member of staff and there is decision to be taken on staff pay and/or conditions.
 - A Trustee or senior manager who is also either a senior manager or on the committee or Board of another organisation that is competing for the same funding.
 - A Trustee or senior manager who has shares in or has a close personal connection with a business that may be awarded a contract to do work or provide services for the organisation.

- 4 Disclosure of Conflicts of Interest**
 - 4.1 Upon appointment each Trustee and senior manager will make a full, written disclosure of interests, such as relationships and posts held, that could potentially result in a conflict of interest. This written disclosure will be kept on file and will be updated as appropriate (annually as a minimum.)

- 4.2 In the course of meetings or activities, Trustees and senior managers are responsible for disclosing any interests in a transaction or decision where there may be a conflict between the NAVCA's best interests and the individual's best interests, or a conflict between the best interests of two organisations that the individual is involved with.
- 4.3 Disclosed interests will be recorded and filed with the relevant Board meeting minutes (for Trustees) and with relevant personnel files (for senior staff).
- 4.4 **The record will contain the following statement:**
After disclosure, I understand that I may be asked to leave the room for the discussion and may not be able to take part in the decision depending on the judgement of the other committee members present at the time.
- 4.5 Any such disclosure and the subsequent actions taken will be noted in the minutes or relevant records.
- 4.6 This policy is meant to supplement good judgment, and staff, volunteers and Trustees should respect its spirit as well as its wording.
- 4.7 In instances where it is unclear if there is a conflict of interest, the Chair and CEO, or other appropriate people, for instance the HR Adviser, will discuss and take action as appropriate.
- 4.8 In the event of a serious conflict of interest NAVCA will follow the governance guidance as laid out in - [Managing conflicts of interest in a charity - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/managing-conflicts-of-interest-in-a-charity) This guidance is developed with trustees in mind but applies appropriately to senior managers too.

5.0 Gifts and Hospitality Register

- 5.1 NAVCA Staff should complete the Register of Gifts and Hospitality and upload it to Breathe HR.
- 5.2 Gifts and hospitality must be recorded when:
- the estimated or known value of the gift or hospitality is in excess of £25; or
 - the cumulative value of gifts or hospitality from the same person, or people from the same organisation, is likely to accrue to more than £25 over the course of the financial year.
- 5.3 Gifts or hospitality between NAVCA's members of staff eg birthday presents do not need to be recorded.