



Conflicts of Interest Guidance

Individuals entrusted by the Foundation to make decisions are under a duty not to place themselves in a position where their personal interest could conflict with that of the charity.

1. **The Foundation requires that all individuals in a position of influence over a decision take responsibility for declaring their interest and negotiating its resolution.** The Foundation will provide the following opportunities to support this.

- **Formal Disclosure**

Applies to Trustees, Committee members, and senior staff

All will complete a register of interests with details of appointments held within the last year (suggestions of the type of appointment are attached). This will be reviewed annually and will be circulated to all Trustees. It will contribute to transparency in decision making. The register will be kept by the Finance Director, in his role as company secretary.

- **Periodic Disclosure For Occasional Conflicts**

Applies to anyone in a position of influence over a decision, including grant administrators, referees, staff who purchase goods and services

When faced with a possible conflict of interest it should be discussed with a line manager or the meeting chairman. An email or written message can also be sent to the Finance Director to record the interest and the resolution of it.

- **An open and supportive culture**

Applies to all

Individuals (particularly those in positions of power) must support an open and encouraging culture where such concerns may be discussed and become settled.

2. **Appointments that might give rise to a conflict of interest**

A useful test of the need for an interest to be declared is whether a member of the public, knowing the facts of the situation, might reasonably think it should be. The following are examples of appointments that should be disclosed. The examples are indicative only and not exhaustive.

- a) Trusteeship of any charity connected to any matter in which the Foundation has an involvement.
Positions with funding bodies, local government, Government Departments and agencies;

- b) Positions with funded institutions e.g. universities, colleges, libraries, research centres, including a University or college lectureship or other teaching appointment, whether stipendiary or non-stipendiary;
- c) Directorship of any company;
- d) Provision of services through a consulting company or otherwise on a regular basis;

3. Direct and obvious conflicts of interest

A direct and obvious conflict would arise with any appointment to a company or body which is receiving benefit from the Foundation.

4. Foundation rules when faced with a conflict of interest:

- 1. Disclose it in advance of any conversation of the subject
- 2. Do not seek to enquire into or influence the decision
- 3. Neither Trustees nor staff should be involved in a decision about a grant in which they have an interest. This will normally be dealt with by withdrawing from the meeting when the decision is made.
- 4. If in doubt it is better to err on the side of disclosure of the interest.
- 5. In cases where any Trustee has any leadership or management role in the applicant's institution, that application and associated papers will not be circulated to a conflicted individual, and that Trustee shall play no part in decision-making about the application.
