



Empowering Young People

CONFLICT OF INTERESTS POLICY

HAYLE YOUTH PROJECT

VERSION 1.0



Conflict of Interests Policy

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Version Control

Prepared by A.Wilde	First Review	Second Review	Issued by

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Policy Pros	September 2022	September 2023	New Policy – First Draft



Conflict of Interests Policy

Introduction

This policy gives guidance to Hayle Youth Project (HYP) and other stakeholders on managing potential conflicts of interest in the organisation.

This policy is relevant for any individuals associated with HYP and its objective is to act as a source of information and guidance for those working for HYP. This document is intended to assist individuals to recognise and deal with conflicts of interest issues, as well as to understand their responsibilities.

Terminology And Definitions

A **conflict of interest** as defined concerning HYP are:

- Any actions undertaken by the organisation or individuals in their daily undertakings which lead it/them to act against its interest.
- Any actions that produce an **Adverse Effect**, which are defined by HYP as:
 - Prejudice in situations.
 - Prejudice in the procurement of goods or services or management of these contracts.
 - Any actions that challenge the impartiality of HYP.
 - Any actions where self-interest undermines the professional position of HYP.
 - Any actions where HYP policies and procedures are purposefully overlooked for the desired outcome contrary to best practice.
 - Negatively affecting the ability of HYP to perform and deliver its obligations at any stage or affect its status.
- Individuals participating in negotiations or decisions where they can indirectly benefit from the outcome, whether benefitting directly or as part of a group.



Conflicts of Interest – Our Objectives

Our core objectives in potential Conflict of Interest scenarios are:

- To reduce the risk of conflicts of interest occurring to protect our service users, organisation, regulatory organisations and other stakeholders.
- To ensure we have full visibility of any reported conflict of interest and its associated factors.
- To ensure we analyse the factors of any conflict of interest and perform objective reporting.
- To communicate with affected parties immediately and professionally with no bias if a conflict of interest issue is raised.
- To perform any corrective and preventative actions to ensure any conflicts of interest are contained including recording incidents and changing processes and procedures in the unlikely event a conflict of interest situation occurs.

Responsibilities

The Executive Board and Associate Trustees/Trustees and employees of HYP are responsible for:

- Investigating and declaring any potential conflicts of interest.
 - This includes any gifts or hospitality offered and received in connection with their role that may lead to potential conflict of interests in the future.
- Reporting situations where these may occur.
- Providing information to assist in any conflict of interest enquiries.
- Completing and signing the Declaration of Interest form if applicable (Appendix 1).



Conflicts of Interest Procedure

1. A conflict of interest should be logged and can come from any form of communication (letter, email, phone call for example). This will be sent to the attention of the Associate Trustees/Trustees in the first instance.
 - a. Subsequently, the Declaration of Interest form (Appendix 1) should be completed.
2. The concern will be communicated to the Associate Trustees/Trustees.
 - a. If the concern relates to a trustee, they will be excluded from any discussions on the potential conflict.
3. An investigation into the potential conflict of interest will take place with any involved parties asked to contribute statements or digital evidence.
4. Parties involved may be suspended or removed from activities related to the conflict situation while the investigation takes place and are expected to reply to requests for information (RFI).
5. Communication into the investigation will be ongoing with the affected parties and relevant Associate Trustees/Trustees.
 - a. This will include the nature and extent of the conflict, with notes taken on the discussions between all parties.
6. The outcome will be determined by HYP Associate Trustees/Trustees and the resulting actions to manage the conflict will be implemented.
7. If relevant, internal documentation will be updated to reflect any corrective and preventative actions that can assist with the situation not occurring again.
8. The outcome will be communicated to all parties and other relevant stakeholders.



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Monitoring and Reviewing

This policy should be reviewed periodically to ensure that it remains compliant with current legislation, meets best practices, and is not discriminatory.

Monitoring will include reviewing the number and type of complaints brought under this policy to assess how it is working in practice.

The results of monitoring will be reviewed by the Associate Trustees/Trustees and Executive Board at regular meetings.

Where evidence or trends indicate that our culture, policy, procedures, or workforce require intervention, an action plan will be initiated.

The version number on new policies is always 1.0 and should be increased by one whole number each time the policy is edited other than to make simple changes, where they may increase in increments of 0.1.





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Appendix 1 – Declaration of Interest Form

Are you or a member of your immediate family a director, trustee, partner, employee or regularly retained consultant of any company or organisation that presently has business dealings with HYP or which might reasonably be expected to have business dealings with HYP in the coming year?

Yes No

If yes, please provide details below:

Name of Company or Organisation	Position Held	Nature of the Business currently or expected to be conducted

Do you or does any member of your immediate family have a financial interest, direct or indirect, in a company or organisation which currently has business dealings with HYP or which may reasonably be expected to have such dealings with HYP in the coming year?

Yes No

If yes, please provide details below:

Name of Company or Organisation	Nature of Interest	The person holding the Interest	Nature of the Business currently or expected to be conducted

Do you or does any member of your immediate family have a financial or personal interest in an entity in which HYP has a financial or other vested interest?

Yes No

If yes, please provide details below:



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Have you or an immediate family member accepted gifts, gratuities, lodging, dining, or entertainment that might reasonably appear to influence your judgment or actions concerning the business of HYP?

Yes No

If yes, please provide details below:

Do you have any other interest or role in a firm or organisation, where that interest or relationship might reasonably be expected to create an impression or suspicion among the public knowing the acts that you engaged in conduct in violation of your trust as a trustee or staff member?

Yes No

If yes, please provide details below:

Please add additional pages as needed. If any material changes to the responses provided on this disclosure form occur, the trustee, officer or employee is required to update the information on this form in writing, and submit the update to the appropriate designated individual.





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Declaration :

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed:	
Position:	
Date:	

Form reviewed by:	
Remedial Action(s) to be taken:	