

**CONFLICT OF INTEREST POLICY**

A guide for NAPA’s staff, freelance workers, trustees and volunteers

This policy will be reviewed on an ongoing basis, at least once a year. NAPA will amend this policy, following consultation, where appropriate.

Date of last review: 03/06/2021

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**Introduction**This policy applies to trustees and all staff, freelance workers, classroom assistants and trustees. It should be read in conjunction with theDeclaration of Interests form. A conflict of interest occurs when an entity or individual becomes unreliable because of a clash between personal (or self-serving) interests and professional duties or responsibilities. Such a conflict occurs when a company or person has a vested interest—such as money, status, knowledge, relationships, or reputation—which puts into question whether their actions, judgment, and/or decision-making can be unbiased. When such a situation arises, the party is usually asked to remove themselves, and it is often legally required of them.

**Why we have a policy**Staff, freelance workers, classroom assistants and trustees have an obligation to act in the best interests of NAPA, and inaccordance with the charity’s governing document.

**What is a conflict of interest?**
Conflicts of interests may arise where an individual’s personal or family interests and/or loyalties conflict with those of the charity. Such conflicts may create problems; they can result in decisions or actions that are not in the interests of the charity. The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

**The declaration of interests**Accordingly, we are asking the trustees and all staff to declare their interests, and anygifts or hospitality received in connection with their role in the charity. A Declaration ofInterests form is provided for this purpose, listing the types of interest you shoulddeclare.

To be effective, the declaration of interests needs to be updated at least annually, and also when any changes occur.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the Chief Executive for confidential guidance. Interests will be recorded on the charity’s register of interests, which will be maintained by the Chief Executive. The register will be accessible to trustees and senior members of staff.

**Data Protection**The information provided will be processed in accordance with data protection principlesas set out in the Data Protection Act 1998 and GDPR. Data will be processed only toensure that trustees and all staff act in the best interests of the charity. The informationprovided will not be used for any other purpose.

**What to do if you face a conflict of interest**You should declare your interest at the earliestopportunity and withdraw from any subsequent discussion/activity. The same applies if you facea conflict for any other reason.You may, however, participate in discussions from which you may indirectly benefit, for example where the benefits are universal to all users, or where your benefit is minimal.

If you fail to declare an interest that is known to the Chief Executive or Chair of Trustees, the Chief Executive or chair will declare that interest.

**Registering of a conflict of interest**
All decisions under a conflict of interest will be recorded by the Chief Executive. Details will include:

• The nature and extent of the conflict
• An outline of any discussion having taken place
The actions taken to manage the conflict

**Managing contracts**If you have a conflict of interest, you must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.