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DATE FOR RENEWAL: September 2026

APPLICABLE TO: All OXPIP staff, trustees, trainees, volunteers, freelancers, contractors and donors

1. Introduction and definition

A conflict of interest is any situation in which an individual's interests, or interests owed to another body, run counter to those of OXPIP.

Conflicts of interests may occur if an individual or organisation they are affiliated with:

- stands to gain directly or indirectly through activities which may potentially affect the Charity adversely.
- has an interest which may be incompatible, in conflict with or take precedence over the needs of OXPIP.
- Is affiliated in any way with an organisation which has aims or practices incompatible, in conflict or acting in direct competition with OXPIP.
- Exercises judgement or act in a way which creates the perception of competing interest, impaired judgement or undue influence which may be damaging to OXPIP's reputation
- has or is perceived to have competing loyalties
- stands to gain an unfair advantage because of personal links with OXPIP

Those interests might include financial interests, indirect financial interests (such as gaining access to OXPIP information which is commercially useful to another provider), professional, personal or indirect (e.g. benefits a spouse or friend).

The existence of an actual, perceived or potential conflict of interest does not necessarily imply wrongdoing on anyone's part. However, any interests which give rise to such a conflict of interest must be recognised, disclosed appropriately and properly managed.

Reporting, recording and managing potential conflicts effectively, protects OXPIP and its staff, and builds public trust and confidence.

Recording Conflict of Interest

A written record of all potential and actual conflicts of interest is to be maintained in a register which describes:

- The nature of the conflict.
- The person(s) affected.
- How management took the decision in the best interests of the charity
- How the CEO, Executive Team, or Board of Trustees have dealt with them.

Further information about recording conflicts of interests for trustees and for staff and volunteers is provided below.

2. Trustees

2.a All trustees have a legal duty to act only in the best interests of their charity.

Conflicts of interest can lead to decisions that are not in the best interests of the charity, which are invalid, open to challenge, unfair or perceived to be so. Conflicts of interest can damage a charity's finances, reputation, public trust and/or confidence in charities. These harmful effects can be prevented where individual trustees identify conflicts of interest, and the trustee body acts to prevent them from affecting their decision making.

Conflicts of interest usually arise where either:

- There is a potential financial or measurable benefit directly to a trustee, or indirectly through a connected person.
- A trustee's duty to the charity may compete with a duty or loyalty they owe to another organisation or person.

In practice this means that trustees cannot receive any benefit from the Charity in return for the service they provide to the Charity, or through their connection to it, unless they have express legal authority to do so.

The Charity Commission identifies examples of potential conflict of interests, where trustees decide to:

- Sell, loan or lease charity assets to a charity trustee.
- Acquire, borrow, or lease assets from a trustee for the charity.
- Pay a trustee for carrying out their trustee role.
- Pay a trustee for carrying out a separate paid post within the charity, even if that trustee has recently resigned as a trustee.
- Pay a trustee for carrying out a separate paid post as a director or employee.
- Pay a trustee, or a person or company closely connected to a trustee, for providing a service to the charity.
- Employ a trustee's spouse or other close relative at the charity.
- Make a grant to a service user trustee, or a service user who is a close relative of a trustee.
- Allow a service user trustee to influence service provision to their exclusive advantage.

2.b Conflicts of Loyalty

These conflicts of interest arise because although the affected trustee does not stand to gain any benefit, the trustee's decision making at the charity could be influenced by his or her other interests. For example, a trustee's loyalty to the charity could conflict with his or her loyalty to:

- The body that appointed them to the charity.
- The membership or section of the charity that appointed them to trusteeship.
- Another organisation, such as their employer.
- Another charity of which they are a trustee.
- A member of their family or close associate.
- Another connected person or organisation.

The test is always whether a trustee's other interest could, or could be seen to, interfere with the trustee's ability to decide the issue only in the best interests of the charity.

2.c Identifying and Declaring Conflicts of Interest

Although declaring conflicts of interest is primarily the responsibility of the affected trustee, the trustee body should ensure that they have strong systems in place so that individual trustees:

- Have a clear understanding of the circumstances in which they may find themselves in a position of conflict of interest.
- Understand their personal duty to declare them.

2.d Register of Interests of Trustees

All trustees should complete a Register of Interests of Trustees on an annual basis and be alert to any other possible conflicts of interest and advise the Chair as soon as they arise.

Conflicts of interest is to be a standard agenda item at the beginning of each Board and committee meeting to allow the opportunity for declaration of any actual or potential interest in any of the items on that agenda.

A trustee should declare any interest which he or she has in an item to be discussed, at the earliest possible opportunity and certainly before any discussion of the item itself.

If a trustee is uncertain whether he or she is conflicted, he or she should err on the side of openness, declaring the issue and discussing it with the other trustees.

If a trustee is aware of an undeclared conflict of interest affecting another trustee, they should notify the other trustees or the chair.

Any trustee who has a financial interest in a matter under discussion, should declare the nature of their interest and withdraw from the room, unless they have a dispensation to speak.

If a trustee has any other interest which does not create a real danger of bias, but which might reasonably cause others to think it could influence their decision, the trustee should declare the nature of the interest. The Chair will decide if the trustee may remain in the room, participate in the discussion, and vote.

If in doubt about the application of these rules, the Chair should be consulted.

2.e Recording potential and actual Trustee Conflicts of Interest

The OXPIP Board of Trustees must keep a written record of conflicts of interests and any decisions relating to them, in line with Charity Commission expectations. The usual way to record the trustees' decisions is in the minutes of their meetings.

Where there is a conflict of interest, the trustees should ensure that the written record of the decision shows:

- The nature of the conflict.
- Which trustee or trustees were affected.
- Whether any conflicts of interest were declared in advance.
- An outline of the discussion.
- Whether anyone withdrew from the discussion.

- How the trustees took the decision in the best interests of the charity.

Recording decisions in this way helps trustees to show that they have acted properly and complied with their duties.

3. Staff, Freelancers, Contractors and Volunteers

All paid staff, freelance and contracted workers and volunteers need to be mindful of potential conflicts of interest. Some examples of potential conflicts of interest are if people use their position with OXPIP to:

- Further their own financial interests e.g. by taking on private work with an OXPIP client (see below).
- Benefit a third party with whom they are associated e.g. recommend a tradesperson to whom they are related without declaring their relationship.
- Discriminate against a service user due to other interests.
- Refer people to agencies with whom they have a connection e.g., to a particular charity with whom you have an involvement.
- Unfairly benefit a service user to whom they are related e.g., by moving someone up the waiting list unfairly.

OR

- Are employed or engaged by an organisation in competition with the Charity.
- Are involved in activities or with groups whose values conflict with those of the Charity.

OXPIP employees may wish to work for other employers or do self-employed work simultaneously. All such work must be notified to the CEO.

3.a Seeing past or present OXPIP clients in private practice

Occasionally, a past or present OXPIP client may seek further work with an OXPIP therapist in private practice. This must be discussed with the Clinical Director prior to any such work being agreed or started. If the client has been discharged by OXPIP, this conversation should occur either with the client's consent or using anonymised details of the client. In most cases, clients will be given details of alternative accredited therapy providers. Occasionally, the client's best interests are served by continuing work with the OXPIP therapist in their private practice, but the therapist must agree this with the Clinical Director in advance. There should be a 6-month break between the end of OXPIP's work and the start of private work. The client can be given the therapist's contact details and invited to contact them in 6 months' time if private work required.

3.b Recording staff and volunteer potential and actual conflicts of interest

Staff and volunteers who have an interest that potentially could be in conflict with their position with OXPIP should bring it to the attention of the Clinical Director and/or CEO for consideration. The CEO with a potential conflict of interest should consult with the Chair of Trustees.

4. Contractors

Contractors is an umbrella term for any person or organisation paid by OXPIP for services or products. This include freelance therapists.

All contractors are required to declare any Conflict of Interest as soon as it is known.

During procurement processes, shortlisted applicants will be asked to declare any Conflicts of Interest and whether they have any existing relationship with OXPIP or its staff, trustees, volunteers or major donors.

5. Donors

Conflicts of Interest must be declared, recorded and managed where any donor may be likely to gain benefit because they have given, or want to give, a donation, pro-bono service, provide hospitality, gifts or in-kind donations. For example, OXPIP may refuse a donation or pro-bono service if the donor is likely to seek a procurement contract with OXPIP. Equally, we may exclude certain suppliers from tendering if they have previously donated or indicate their intention to.

6. Managing Conflicts of Interests

Most conflicts of interest can be successfully managed if they are known and out in the open.

Where a conflict of interest is reported or has occurred, the Chair and/or CEO will assess the conflict of interest and propose a management approach, or delegate this task to the Operations Manager or person's line manager.

Individuals' interests outside of their role with OXPIP should not necessarily prevent them from continuing in that role, providing they have been transparent and co-operative with the Board's and/or CEO's suggested plan of mitigation or management.

If it is deemed that any individual has failed to disclose a conflict of interest, acted in their own interests to the potential detriment of others or the Charity, or is in breach of this policy in any other way, disciplinary action may be taken.

Signed	Date	Print
<i>H. Callaghan.</i>	30.9.24	Helen Callaghan, Joint CEO
<i>Karen Bateson</i>	23.9.24	Karen Bateson, Joint CEO