

## **Conflict of Interests Policy**

### **Introduction**

Active Norfolk is committed to the highest possible standards of openness, probity and accountability as well as conducting business in a manner that ensures business judgment and decision making is not influenced by undue personal interests.

We are expected to act impartially and objectively, and to take steps to avoid any conflict of interest arising as a result of the membership of, or association with, other organisations or individuals.

When an employee's or volunteer's personal interests either influence, have the potential to influence, or are perceived to influence their decision making at Active Norfolk, a conflict of interest situation results.

This Policy explains the relevant principles and rules for preventing or managing conflicts of interest and how such principles and rules are to be implemented across the organisation.

### **Aims of the policy**

This Policy explains Active Norfolk's position regarding conflicts and potential conflicts of interest that may arise during the course of our business. It also serves to raise awareness with all colleagues about conflicts and to provide guidance on how to manage conflict of interests so that colleagues can act in the best interests of Active Norfolk.

### **Who does this apply to?**

The policy applies to all individuals conducting work for Active Norfolk who have decision making responsibilities. And as such covers:

- Employed staff
- Volunteers
- Board members

It does not apply to any external contractors or work experience staff.

## **What is a conflict of interest?**

Conflicts of interest may arise where a colleague's personal, family or business interests or loyalties conflict or appear to conflict with those of Active Norfolk. Such conflicts may create problems such as inhibiting free discussions or impair the ability to act or think objectively. This may result in actions or decisions that are not in Active Norfolk's best interests. Even where a colleague has acted impartially a perceived conflict of interest can be damaging to Active Norfolk's reputation.

Examples of potential conflicts of interest include, but are not limited to:

- Awarding a contract to an organisation in which the employee has a financial interest or personal connection.
- Having personal or business dealings with organisations which detract from the aims of Active Norfolk
- Using Active Norfolk networks to pursue personal business, commercial or consulting activities
- Personal or close-family involvement in an organisation that is attempting to obtain a contract or business with Active Norfolk and you are involved in the pricing or placing of the contract.

All staff or volunteers working on any new key projects/procurements/sponsorships etc. should be asked for declarations of any Conflicts of Interest at the outset. 'Nil' declarations should be made where there are none, with both positive and negative declarations recorded with the Active Norfolk Operations Manager or through the relevant project recording channels.

Active Norfolk recognises that as we carry out our work, conflicts of interest may arise. We need to be able to identify and manage these conflicts so as to reduce the risk of any actual or perceived wrongdoing, for the organisation and for the individuals concerned.

## **The declaration of interests**

Active Norfolk understands that avoiding a conflict of interest may not always be possible or practical. The required action for an employee or volunteer who does not or cannot avoid a conflict of interest is to disclose it.

Having a conflict of interest is not necessarily wrong. However, it can become a problem or a legal matter if an employee tries to influence the outcome of business dealings for direct or indirect personal benefit. This is why transparency, in the form of disclosure, is critical and helps to protect the integrity and reputation of Active Norfolk and the Employee or volunteer.

The onus is upon each of us, as people working for a body in receipt of public funds, to declare any actual or potential conflict of interest at the earliest opportunity. It is not the responsibility of Active Norfolk to seek this out.

To help you and us identify potential conflicts of interest all colleagues are required upon appointment to complete a Declaration of Interest Form. On an annual basis

each employee and Board member will be required to review and update the declaration of conflicts of interest

Colleagues should declare in respect of themselves and their immediate family (spouse/partner, children and parents) the following interests:

- Membership or involvement with sports club and/or governing bodies of sport
- Membership or involvement with other organisations that might be eligible to apply to Active Norfolk for financial support
- Commercial interests in companies and organisations that may undertake business with Active Norfolk
- Secondary employments that may impact the individual's ability to prioritise work at Active Norfolk

Where colleagues are unsure about whether they should declare an interest, they should seek guidance from the Operations Manager or Chair or the Board. However as a general guide colleagues should ask themselves "*Would the reputation of Active Norfolk and my own reputation be damaged if this was reported in a national newspaper?*" "*Is my flexibility or capability to prioritise Active Norfolk work affected by this activity?*"

Colleagues are responsible for amending their declarations of interests as soon as possible following any change in their circumstances and for reviewing their declaration of interests at least annually regardless of any changes in circumstances.

Additionally Board members should declare potential conflicts at any Board meetings where items for discussion might require highlighting. A specific agenda point at Board meetings is provided to assist in this regard.

### **Addressing a conflict of interest**

Addressing a conflict of interest is the process of identifying and implementing strategies and practices to minimize the risks associated with the disclosed conflict of interest. Addressing a conflict of interest is the responsibility of the Line Manager for paid staff, and for the Chairperson or Senior Independent Director of the Active Norfolk Board (as applicable). Specifically, Active Norfolk expects the person responsible to:

- Treat the information disclosed by the individual with appropriate confidentiality and without bias
- Fairly evaluate the conflict of interest situation disclosed by the individual, including the risks to the business interests and reputation of Active Norfolk
- Seek guidance if needed from the respective SMT member or Operations Manager for staff, or from the Chair or Senior Independent Director for Board members.
- Make a pragmatic decision to address the conflict of interest so that risks to Active Norfolk are minimized and the personal interests of the Employee are protected as far as possible

- Communicate the decision and its reasoning to the individual and follow up to ensure the individual understands and complies with it
- Retain documentation of the decision using the standard Conflict of Interest Form

Many conflict of interest situations can be addressed in a simple and mutually acceptable manner; pro-active, open dialogue between those responsible and staff is essential to support this outcome.

### Monitoring and review

All new appointees will be asked upon joining to complete a declaration of conflicts of interest form, which will be collated by the Operations Manager or the Director deputy for review and sign off. Additionally, on an annual basis, each individual will be required to review and update the declaration of conflicts of interest. SMT and Board members will have access to the declarations to assess whether a potential conflict of interest may exist.

Additional declarations may be requested in the event of individuals working on any new key projects/procurements/sponsorships etc. at the outset. 'Nil' declarations should be made where there are none, with both positive and negative declarations recorded in the relevant system.

It should be noted that this policy in no way detracts from existing NCC policies which Active Norfolk staff are bound to follow through their employment contract.

Review schedule:

Revision date	Reviewed by	Board approval	Date of Board approval
24 <sup>th</sup> August 2022	K Tuck	Pending	21 <sup>st</sup> September 2022