

Conflict of Interest Policy

This policy applies to all trustees, employees and volunteers

Why we have a policy

Trustees have a legal obligation to act in the best interests of the charity, and in accordance with the charity's governing document. Staff and volunteers have similar obligations to protect the integrity of Lepra's decision-making process; this is to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of volunteers, staff and trustees.

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:

- Inhibit free discussion;
- Result in decisions or actions that are not in the interests of the charity; and
- Risk the impression that the charity has acted improperly

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

Examples of conflicts of interest include: (the following are not exhaustive or exclusive)

- An employee or trustee who is related to a member of staff and there is a decision to be taken on staff pay and / or conditions
- An employee, volunteer or trustee who is also on the committee of another organisation that is competing for the same funding
- An employee, volunteer or trustee who has shares in a business that may be awarded a contract to do work or provide services for the organisation

The declaration of interests

Given this, we are asking the trustees and all staff and volunteers to declare their interests and any gifts or hospitality received in connection with their role in the charity. A declaration of interests form is provided for this purpose and lists examples of the types of interest you should declare.

To be effective, the declaration of interests needs to be updated annually - by 31st March each year and also when any changes occur. New, trustees, employees and volunteers will be asked to declare their interests on joining Lepra.

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 company secretary (who at Lepra is the chief executive) for confidential guidance.

Interests will be recorded on the charity's register of interests, which will be maintained by the company secretary. The register will be accessible to trustees, senior members of staff and Lepra's auditors.

Data Protection

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that trustees and all staff and volunteers act in the best interests of the charity. The information provided will not be used for any other purpose.

What to do if you face a conflict of interest

In the UK we do not have users of the charity's services and therefore this policy does not cover decisions that impact service users. However, if you face a conflict for any other reason, you should not be involved in decisions that directly benefit you. You should declare your interest at the earliest opportunity and withdraw from any subsequent discussion.

You may, however, participate in discussions from which you may indirectly benefit, for example where the benefits are universal to all, or where your benefit is minimal.

If you fail to declare an interest that is known to the company secretary and / or the chair, the secretary or chair will declare that interest.

Decisions taken where a trustee or member of staff or volunteer has an interest

In the event of the board of trustees having to decide upon a question in which a trustee or member of staff or volunteer has an interest, all decisions will be made by vote, with a simple majority required. A quorum must be present for the discussion and the decision; interested parties will not be counted when deciding whether the meeting is quorate. Interested board of trustee members may not vote on matters affecting their own interests.

All decisions under a conflict of interest will be recorded by the company secretary and reported in the minutes of the meeting. The report will record:

- The nature and extent of the conflict
- An outline of the discussion
- The actions taken to manage the conflict

Where a trustee benefits from the decision, this will be reported in the annual report and accounts in accordance with SORP2005.

Independent external moderation will be used where conflicts cannot be resolved through the usual procedures.

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.

Where to go for further information and advice

Further information and advice for trustees, staff and volunteers can be found at the Charity Commission website - www.charitycommission.gov.uk.

Declaration of interests form

I in my capacity as an employee / volunteer / trustee of Lepra (delete where necessary) have set out below my interests in accordance with the organisation's Conflict of Interest Policy.

Category	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family or some other close personal connection
Any employment in which you continue to have a financial interest	
Appointments (voluntary or otherwise) e.g. trustee, director, councillor, tribunal panel member, etc.	
Membership of any professional bodies, special interest groups or mutual support organisations	
Investments in unlisted companies, partnerships and other forms of business, major shareholdings and beneficial interests	
Gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last twelve months	
Any contractual relationship with Lepra	

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: