



EAST SUSSEX EARLY DAYS CONFLICT OF INTEREST POLICY

Purpose

East Sussex Early Days CIC (ESED) workers and volunteers have a legal obligation to act in the best interest of the organisation. Conflicts of Interest may arise where an employee's personal, family or other interests and/or loyalties conflict with those of ESED. Such conflicts can inhibit free discussion, result in decisions and actions that are not in the interests of ESED, and risk the impression that ESED has acted improperly.

The aim of this policy is to protect ESED workers and volunteers from any appearance of impropriety. The policy explains what is meant by the term "conflict of interest", details measures that should be taken to prevent such conflicts occurring and outlines how any potential conflict of interest should be managed.

The establishment of a register of interests is part of ESED's commitment to good governance.

Definitions and scope of policy

A conflict of interest is defined as: "any situation in which an individual's obligations to ESED differ from their obligations to any third party, from the individual's personal interests or from those of his/her immediate family, whether financial or otherwise, and when those other obligations and interests may, or may be perceived, to influence the individual's performance of their obligations to ESED."

Situation that may give rise to a conflict of interest include but are not limited to:

- Current employment or self-employment, or any previous employment or self-employment in which you continue to have a financial interest.
- Appointments (voluntary or otherwise) e.g., trusteeships, directorships, local authority membership, tribunal membership etc
- Membership of any professional bodies, special interest groups or mutual support organisations.
- Investments in unlisted companies, partnerships and other forms of business, major shareholding, e.g., more than 1% of issued capital and beneficial interests.
- Gifts or hospitality offered to you whether this was declined or accepted.
- Any contractual relationship with ESED or any subsidiary.

Members of staff must not:

- Use their office or employment for personal gain and should always act in good faith and in the interests of ESED.
- Accept gifts or favours offered by an external party. Any such gifts or favours offered should be reported to the Board in order to ensure that no suggestion of impropriety could be made in the future.

In order to avoid unnecessary declarations of gifts that are not financially significant, workers and volunteers are not required to declare gifts that individually are of a value of £10 or less. The offer and acceptance of routine hospitality that is made to others as part of the conduct of normal business, for example the provision of lunch or accommodation at a meeting or conference, is not in itself likely to fall within the remit of this policy. However, preferential individual provision may do and should be declared if there is any doubt.

Internal relationships

Personal relationships between workers and between workers and volunteers should be declared to avoid any allegations of favouritism. Declarations of such relationships will need to be handled in a sensitive manner and issues of confidentiality will need to be considered carefully.

Declaration of Interests Procedure

It is up to everyone to decide if a conflict of interest could exist and, if so, to declare it. When deciding on such matters, consideration must be given to how things could appear to others and, in all cases, workers and volunteers should err on the side of caution, declaring an interest if there is any possibility that a conflict of interest exists. ESED asks its workers and

volunteers to declare their interest and any gifts or hospitality received in connection with their role in the organisation.

A Declaration of Interests form is provided for this purpose (see Appendix 1), listing the types of interest that should be declared. Interests will be recorded on ESED's Register of Interests which will be maintained by the Directors and will be accessible by the Board and Management Team and the company's auditors.

Declarations of Interests will be updated annually by asking staff to confirm that the information contained in the Declaration of Interest form is still valid. Any changes during the year will be entered as notified to ESED. Workers are responsible for notifying any changes to the Board as soon as possible.

Managing Conflicts of Interest

A completed declaration of interest form does not replace the need for workers to declare relevant interests during the business of a meeting or during day-to-day activity if appropriate.

This may arise if

- An employee
- Member of their immediate family
- Other close personal contact or
- Organisation in which they hold office or employment

is a user or beneficiary of ESED's services, grants or faces a conflict for commercial or business-related reasons, they must not engage in decisions that affect them. They must declare their interest at the earliest opportunity. At the discretion of the Chair an individual may continue to be involved in any discussion where their interest results in insight that may be beneficial but must withdraw from any decision-making process. Workers may participate in discussions from which they may indirectly benefit, e.g., where benefits are universal to all users, or where the benefit is minimal.

Where a worker has a conflict of interest, they must not be involved in selecting a contractor or managing and monitoring a contract in which they 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.

All decisions under a conflict of interest will be recorded and reported in the minutes or other record 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 worker, volunteer or person they are close to benefits from the decision, this will be reported in the Annual Report and Accounts in accordance with SORP requirements.

Date of Policy: 10/04/2023

Review date: 10/04/2026

APPENDIX 1

Register of Interests

As a worker (Name) I have set out below my interests in accordance with East Sussex Early Days CIC's Conflict of Interest policy.

Category	Give details of the interest and if it applies to you or a member of your immediate family or some other close personal connection
Current or previous paid employment/self-employment in which you continue to have a financial interest. Please give details of the employer, the nature of the work & the time involved.	
Appointments (voluntary or otherwise) e.g. Trusteeships, Directorships, Local Authority memberships, etc.	
Membership of any professional bodies, special interest groups or mutual support organisations (including political parties).	
Investments in unlisted companies, partnerships & other forms of business, major shareholdings (more than 1% of issued capital) and beneficial interests.	
Gifts or hospitality offered to you by external bodies & whether this was declined or accepted in the last 12 months.	
Do you use, or care for a user of the organisation's services?	
Any contractual relationship with {ORGANISATION}	
Any other conflicts that are not covered by the above	

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided. I give my consent for it to be used for the purposes described in the Conflicts of Interest Policy and for no other purpose.

Name : _____ Signature: _____

Date: _____