



BTTAD CONFLICTS OF INTEREST POLICY

Introduction

There is no right or wrong approach to handling potential conflicts of interest. Ultimately, the issue is about the application of common sense. The key principles of the BTTAD policy are as follows:

Definition of a conflict of interest for the BTTAD.

some personal financial interest for a committee/ member/official/employee for a conflict of interest to be considered, or historical connection to the beneficiary of a decision likely to be sufficient to trigger the procedures.

Consider the future likelihood of such conflicts.

Is the conflict of interest likely to be *exceptional* in which case the person's role may be unproblematic, or would it be so frequent that it might be best to consider alternative role or no role at all.

Agree the method of declaring an interest:

This may be a written declaration completed annually. Alternatively or as well, it may be a declaration at or before the meeting at which the decision in question will be considered.

Agree the method of addressing the conflict

There are numerous ways of addressing a conflict of interest. The person in question might absent themselves completely from all consideration, or they may participate in the discussion but not the decision.

Why have a policy?

Members of BTTAD Committee, other officials and all paid staff have an obligation to act in the best interests of the BTTAD, and in accordance with the BTTAD's aims and objectives. Other volunteers have similar obligations. Conflicts of interests may arise where an individual's personal, family or business interests and/or loyalties conflict with the objectives of the BTTAD

Such conflicts may create problems and can:

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

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety. Even the appearance of a conflict of interest can damage the reputation of the BTTAD.

Conflicts of interest may come in a number of different forms:

These forms will generally include

- Direct financial gain or benefit to the interested party, such as a payment for services provided to the BTTAD or the award of a contract to another organisation in which the interested party has interest or involvement and from which there is an opportunity for financial gain; or the appointment of an interested party in a separate post within the BTTAD.

- Indirect financial gain, such as the appointment by the BTTAD of a relation or friend of an interested party.

The declaration of interests

Accordingly, we are asking Committee Members, other officials and all staff to declare their interests, and any gifts or hospitality received in connection with their role in the BTTAD. A declaration of interests form is provided by the BTTAD for this purpose, listing the types of interest you should declare.

The declaration of interests needs to be reviewed/updated at least annually and also when any changes occur.

If anyone is not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If anyone would like to discuss this issue, please contact the Chairman or Secretary for confidential guidance. Interests will be recorded on the BTTAD's register of interests, which will be maintained by the BTTAD Secretary. The register will be accessible by only the Officers of the BTTAD..

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 the Committee Members, officials and all staff will act in the best interests of the BTTAD. The information provided will not be used for any other purpose.

What to do if you face a conflict of interest?

If you are a user of the BTTAD's services, you should not be involved in decisions that directly affect the service that you receive. You should declare your interest at the earliest opportunity and withdraw from any subsequent discussion. The same applies if you face a 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 an Officer of the BTTAD, they will declare that interest for you.

Decisions taken where a Committee member, other official or member of staff has an interest

In the event of the Committee having to decide upon a question in which a Committee Member, other official or member of staff has an interest, all decisions will be made by vote, with a simple majority required. A quorum must be present for the discussion and decision, excluding those interested parties.

Interested Committee members may not vote on matters affecting their own interests. They must absent themselves from the discussion or at the discretion of the chair, participate in the discussion but not the decision-making process.

All decisions under a conflict of interest will be recorded by the 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.