



CONFLICT OF INTEREST POLICY

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Conflict of Interest Policy	Chief Executive Officer
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Signed	G Day

Disability Action Haringey (DAH) – Conflict of Interest Policy

1. Introduction and Purpose

1.1. Disability Action Haringey (DAH) recognises that employees, trustees, and volunteers have diverse interests and connections within local, regional, and national communities. These links often benefit both DAH and the wider community. However, such relationships may sometimes give rise to actual, potential, or perceived conflicts of interest.

1.2. A conflict of interest arises when the personal interests of an employee, trustee, or a “connected person” are incompatible or in competition with the interests of DAH. This situation creates a risk that decisions could be influenced by personal considerations rather than by what is best for the charity.

1.3. DAH expects that individuals will act with integrity and openness to ensure that there can be no perception of inappropriate advantage or bias. In most cases, potential conflicts can be resolved informally through discussion with a line manager, the Chief Executive, or the Chair of Trustees.

1.4. The purpose of this policy is to:

- help identify and prevent conflicts of interest;
- establish a clear system for disclosure and management;



- provide guidance to staff, trustees, and volunteers;
- protect the integrity and reputation of DAH, and safeguard individuals involved.

1.5. Nothing in this policy removes statutory or ethical responsibilities such as confidentiality with the people and communities we support.

1.6. This policy applies to all employees, trustees, and volunteers of Disability Action Haringey, covering any actual, perceived, or potential conflicts of interest related to DAH's work.

2. Principles

2.1. DAH values openness and integrity. The rights and responsibilities of staff, trustees and volunteers must be balanced with DAH's duty to manage conflicts transparently and fairly.

2.2. Everyone representing DAH must act in the best interests of the charity and the D/deaf & disabled community we serve.

2.3. Staff are also protected under the Public Interest Disclosure Act 1998 and DAH's Whistleblowing Policy.

2.4. DAH commits to:

- respecting the private concerns of individuals where these do not impact the charity's interests; and
- addressing all potential conflicts promptly, fairly, and objectively, while protecting individuals' reputations.

2.5. The existence of a conflict of interest does not necessarily indicate wrongdoing. However, any relevant personal, financial, or non-financial interests must be openly declared and appropriately managed.

3. Definitions

- **Conflict of Interest:** a situation where personal interests could, or could be perceived to, influence an individual's ability to make impartial decisions in their DAH role.
- **Actual Conflict:** a real conflict between personal and charity interests.



- **Perceived Conflict:** a situation where it might appear that personal interests could influence decisions.
- **Potential Conflict:** a situation that could develop into a conflict in the future.
- **Personal Interest:** a financial or non-financial benefit to the individual, a family member, friend, or associate.
 - *Financial interests* include payments, contracts, gifts, commissions, or ownership stakes.
 - *Non-financial interests* include personal relationships, prestige, access to privileged information, or career advancement.
- **Connected Person** includes close family members (spouse, partner, parents, siblings, or children), close friends, or others whose relationship could reasonably be perceived to influence the individual's judgement.

4. Identifying a Conflict of Interest

4.1. Individuals should consider whether their personal interest could reasonably be seen as affecting their impartiality. They should ask: *Would others trust my judgement if they knew about this connection or interest?*

4.2. Common examples include:

- influencing a contract, recruitment, or funding decision involving a company, friend, or relative;
- using DAH resources, contacts, or information for private gain;
- sharing confidential information for personal benefit;
- undertaking outside work or roles that compromise performance or independence at DAH.

4.3. If unsure whether a conflict exists, individuals should assume there may be one and disclose it.

5. Disclosure

5.1. The responsibility for identifying and declaring a conflict rests with the individual.



5.2. Employees should disclose conflicts to their line manager or the Chief Executive. Trustees should disclose to the Chair. If there is any uncertainty or sensitivity, advice can be sought in confidence from DAH CEO, fellow trustee, or the charity's HR provider Peninsula.

5.3. Disclosures should include details of the nature of the conflict, people involved, potential benefit or risk, and any relevant background. Disclosures will be treated confidentially and recorded securely.

6. Failure to Disclose

6.1. Failure to disclose an actual or perceived conflict, or to step back from related decisions, may be treated as a disciplinary matter and could result in formal action, including dismissal.

6.2. For trustees, failure to declare a conflict may result in action under the Charity Commission's governance standards and DAH's Code of Conduct.

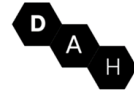
7. Managing and Resolving Conflicts

7.1. Once declared, the relevant manager, Chief Executive, or Chair (the "Reviewer") will assess the situation and decide how to proceed. The individual must not participate in related discussions or decisions until the conflict is resolved.

7.2. Options for resolution may include:

- confirming that no conflict exists;
- allowing the activity with safeguards (e.g. transparency, external oversight, or limited involvement);
- removing the individual from decision-making;
- adjusting duties or responsibilities;
- ending the conflicting activity or relationship.

7.3. All disclosures and decisions will be recorded and retained securely for audit and governance purposes.



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Charity Registration Number 1191762

8. Review and Governance

This policy will be reviewed every three years or sooner if required by changes in legislation, Charity Commission guidance, or DAH's governance structure.

Date of Next Review – September 2027