

# **Conflict of Interest Policy**

LEGACY SKILLS GROUP LIMITED

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# Policy Statement

This company conflict of interest policy applies to all prospective or current employees of the company, as well as independent contractors and persons acting on behalf of the company.

Conflict of interest may occur whenever an employee's interest in a particular subject may lead them to actions, activities or relationships that undermine the company and may place it to disadvantage.

This policy applies to BOARD MEMBERS AND ALL STAFF.

## Principles

The key principles to any effective policy are as follows:

- Define a conflict of interest in relation to your organisation: Would there have to be some personal or financial interest for a board member/employee for a conflict of interest to be considered or would historical connection to the beneficiary of a decision 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 membership of the decision-making body is unproblematic, or would it be so frequent that it might be best to consider alternative membership of the council.
- Agree the method of declaring an interest: This may be a written declaration completed annually. Alternatively, 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: Again, 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.

# The Policy

Board Members have an obligation to act in the best interests of Legacy Skills Group Ltd, and in accordance with Legacy Skills Group Ltd governing document. [Staff and volunteers have similar obligations.] Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of Legacy Skills Group Ltd.

Such conflicts may create problems; they can:

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

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

## The Declaration of Interests

Accordingly, we are asking Board Members and all staff to declare their interests, and any gifts or hospitality received in connection with their role in Legacy Skills Group Ltd. A Declaration of Interests form is provided for this purpose, listing the types of interest you should declare.

To be effective, the declaration of interests needs to be updated at least annually, and also when any changes occur.

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 Supervisor, Senior Carer or General Manager, Wendy Ruston for confidential guidance. Interests will be recorded on the governing body's register of interests, which will be maintained by Legacy Skills Group Ltd. The register will be accessible by [level of access, noting any statutory requirements applicable].

## Data Protection

The information provided will be processed in accordance with data protection principles as set out in Data Protection legislation. Data will be processed only to ensure that Board Members

and all staff act in the best interests of Legacy Skills Group Ltd. 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 Legacy Skills Group Ltd, or the carer of someone who uses Legacy Skills Group Ltd, you should not be involved in decisions that directly affect the service that you, or the person you care for, receive(s). 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 Legacy Skills Group Ltd secretary and/or the Director, Stephen Moseley, and the General Manager, Wendy Ruston will declare that interest.

All decisions under a conflict of interest will be recorded by Legacy Skills Group Ltd 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.

## 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.

## Related Guidance

Managing conflicts of interest

<https://www.nhsemployers.org/your-workforce/need-to-know/managing-conflicts-of-interest>

Acas Contracts of employment

<http://www.acas.org.uk/index.aspx?articleid=1577>

Support Document Number: LSG24008

LEGACY SKILLS GROUP LIMITED | Company number: 12720113 | Please consider recycling this item.

# Training Statement

All staff, during induction are made aware of the organisations policies and procedures, all of which are used for training updates. All policies and procedures are reviewed and amended where necessary and staff are made aware of any changes. Observations are undertaken to check skills and competencies. Various methods of training are used including one to one, on-line, workbook, group meetings, individual supervisions and external courses are sourced as required.

Person responsible for updating this policy: Carol Pritchard  
Next Review Date: Aug 2024