

CONFLICTS OF INTEREST POLICY

This policy applies to all trustees and staff.



Why we have a policy

Trustees have a legal obligation to act in the best interests of Headlines, and in accordance with the charity's governing document, and to avoid situations where there may be a potential conflict of interest. Staff have similar obligations.

Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of Headlines.

Such conflicts may create problems; they can, for example:

- inhibit free discussion
- result in decisions or actions that are not in the interests of the charity
- create 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.

Accordingly, Headlines requires all trustees and staff to declare their interests, and any gifts or hospitality offered and received in connection with their role in the charity.

A Declaration of Interests form is provided for this purpose (see below), listing the types of interest that need to be declared. To be effective, the declaration of interests needs to be updated at least annually, and when any material changes occur.

If a trustee or member of staff is unsure what to declare, or whether/when their declaration needs to be updated, they should err on the side of caution.

The Register of Interests will be used to record all gifts and hospitality over *de minimis* value received by the trustees and staff in the course of their work for the charity.

Interests and gifts will be recorded on the charity's Register of Interests, which will be maintained by the charity Secretary.

Data protection

The information provided will be processed in accordance with data protection principles as set out in the Headlines' Data Protection and Privacy Policy. Data will be processed only to ensure that trustees and staff 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

If a trustee or member of staff believes they have a perceived or real conflict of interest they should:

- declare the interest at the earliest opportunity
- withdraw from discussions and decisions relating to the conflict.

The charity Secretary should take special care to ensure that minutes or other documents relating to the item presenting a conflict are appropriately redacted for the person facing the conflict. A balance needs to be made to ensure that the person still receives sufficient information about the activities of the charity generally without disclosing such sensitive information that could place the individual in an untenable position.

If a trustee or member of staff fails to declare an interest that is known to the charity Secretary and/or the Chair, the charity Secretary or Chair will declare that interest.

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

In the event of the board having to decide upon a question in which a trustee 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; interested parties will not be counted when deciding whether the meeting is quorate.

Interested board members may not vote on matters affecting their own interests

All decisions under a conflict of interest will be recorded by the charity 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 the current Charities SORP.

All payments or benefits in kind to trustees will be reported in the charity's accounts and annual report, with amounts for each trustee listed for the year in question (note that this does not include reimbursement for travel or other expenses incurred on behalf of Headlines).

Where a trustee or member of staff, or members of their family or business partners (or other connected person), are connected to a party involved in the supply of a service or product to the charity, this information, including amounts paid to the party will be fully disclosed in the annual report and accounts. Other 'related party' disclosures include donations received by the charity from trustees or members of staff, or their families or business partners (or other connected person).

Managing contracts

If a trustee or member of staff has a conflict of interest, they must not be involved in managing or 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.

DECLARATION OF INTERESTS FORM

(England & Wales)



I as employee/trustee* [**delete as appropriate*] of Headlines Craniofacial Support have set out below my interests in accordance with the organisation's Conflicts 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, connected persons or some other close personal connection
Current employment and any previous employment in which you continue to have a financial interest.	
Appointments (voluntary or otherwise) e.g. trusteeships, directorships, local authority membership, tribunals 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 of more than 5% of issued capital and beneficial interests.	
Gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last twelve months.	
Do you use, or care for a user of the organisation's services?	
Any contractual relationship with the charity or its subsidiary	
Any other conflicts or potential 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, 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:

Date: