



**Heritage Lab Ramsgate**  
Curiously Creative Spaces

## **Conflict of Interest Policy**

### **Introduction**

All staff, Monitors, Contractors, volunteers, and Directors of Heritage Lab CIC will strive to avoid any conflicts of interest between the interests of Heritage Lab CIC on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

Conflicts of interest will be noted in the minutes of the relevant meeting and the process of the decision making, as well as the decision, will also be captured in the minutes

The purpose of this policy is to protect the integrity of HL CIC's decision making process, to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of staff, Monitors, Contractors, volunteers, and Directors.

### **Directors**

Upon appointment each Director will make a full, written disclosure of interests, such as relationships, and posts held, that could potentially result in [or potentially be seen as] a conflict of interest. The completed "Conflicts of interest disclosure form" will be kept on file, and will be updated annually and/or as appropriate.

In the course of meetings or activities, Directors will disclose any interests in a transaction or decision where there may be a conflict between the organisation's best interests and the Directors best interests or a conflict between the best interests of two organisations that the Director is involved with.

### **Examples of conflicts of interest include:**

- A Director who is also a customer who must decide whether fees from customers should be increased.
- A Director who is related to a member of staff and there is decision to be taken on staff pay and/or conditions.
- A Director who is also on the Board of another organisation that is competing for the same funding.
- A Director who has shares in a business that may be awarded a contract to do work or provide services for the organisation.
- A Director who is a Monitor engaged by HL CIC when their remuneration and/or terms and conditions are discussed.

*This list is not intended to be exclusive but is indicative of the kind of issues that can arise.*

### **Staff, Monitors, Contractors and Volunteers**

Staff, Monitors, Contractors and volunteers need to be mindful of potential conflicts of interest. If they have an interest that potentially could be in conflict with their position within HL CIC, they should bring it to the attention of their line manager who will pass it onto the senior management team for consideration. Board members with a potential conflict of interest should consult with the CEO and in similar circumstances the CEO should consult with the Chair. Most conflicts of interest can be successfully managed if they are known and out in the open. Staff, Monitors, Contractors and volunteers' interests outside of their role with HL CIC, providing they are transparent, should not necessarily prevent them from continuing in that role. Where it is deemed that a member of staff, Monitor, Contractor or volunteer acted in their own interests, to the potential detriment of others or HL CIC, disciplinary action could be taken.

### **Examples of conflicts of interest include:**

- Further their own financial interests e.g. by taking on private work with a client
- Benefit a third party with whom they are associated e.g. recommend a tradesperson to whom they are related
- Refer people to agencies with whom they have a connection e.g. to a particular charity with whom they have an involvement
- Unfairly benefit a service user to whom they are related e.g. by applying a reduced charge for a service

*This list is not intended to be exclusive but is indicative of the kind of issues that can arise.*

**This policy is meant to supplement good judgement, and staff, Monitors, Contractors and volunteers, and Heritage Lab CIC board members, should respect its spirit as well as its wording.**

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