



Conflict of Interest and Reporting of Gifts

The purpose of this policy is to protect Anti-Tribalism Movement, its employees, volunteers and board members from any conflict of interest or the appearance of any conflict of interest.

The aim is to protect the integrity of Anti-Tribalism Movement decision-making process, to enable stakeholders to have confidence in its integrity, and to protect the integrity and reputation of the employees, volunteers and board members.

What is a conflict of interest and what issues does it raise?

Employees, volunteers and board members must put the interests of Anti-Tribalism Movement first when representing Anti-Tribalism Movement. A conflict of interest or appearance of a conflict of interest may arise where the objectives or interests of Anti-Tribalism Movement and the personal objectives or interests of a board member or employee or volunteer appear to, or do, fundamentally diverge.

To avoid any damage to Anti-Tribalism Movement's reputation, any perceived or real conflict of interest needs to be managed carefully and with transparency.

A real or perceived conflict of interest may:

- Inhibit free discussion.
- Result in decisions being taken or actions occurring that are not in the interests of Anti-Tribalism Movement.

- Risk the impression that Ant-Tribalism Movement has acted improperly.

Ant-Tribalism Movement is keen to ensure that its employees, volunteers and board members are able to carry out complementary activities alongside their work for Ant-Tribalism Movement. However, any real or perceived conflict of interest that may arise out of these engagements must be managed in such a way as to ensure that employees, volunteers and board members or their friends and family are not favored especially in terms of service, employment or funding from Ant-Tribalism Movement

Real or perceived conflicts of interest may come in a number of different forms:

- For board members
 - Direct financial gain or benefit to a Ant-Tribalism Movement board member, such as payment to that board member for services provided to Ant-Tribalism Movement or
 - The award of a contract to another organisation in which a board member of Ant-Tribalism Movement has an interest and from which that board member may receive a financial benefit; or
 - The employment of a board member of Ant-Tribalism Movement in a separate post within Ant-Tribalism Movement, even when that board member has resigned in order to take up that employment; or
 - Where a board member of Ant-Tribalism Movement is also a trustee, member, employee or director of another organisation that is competing for funding from the same source as Ant-Tribalism Movement.
 - Indirect financial gain, such as employment by Ant-Tribalism Movement of a relation or friend of an employee, volunteer or board member;
 - Seeking external funding for personal interests on the basis of the applicant's link with Ant-Tribalism Movement; or
 - Non-financial gain, such as when a user of Ant-Tribalism Movement services is also a board member of Ant-Tribalism Movement.

The Declaration of Interests

Upon appointment each employee, volunteer or board member should complete a Conflict-of-Interest form, in connection with their role at Ant-Tribalism Movement. This should be updated at least annually or when any changes occur which may give rise to an actual or perceived conflict of interest, if this is sooner. The Operations Team will send out annual reminders to all employees, volunteers and board members.

In addition, the board will be reminded of their obligation to declare any conflicts of interest annually at the first board meeting of the year. Charity Commission guidance states 'It is good practice at the beginning of a meeting for every charity trustee to declare any private interest which he or she has in an item to be discussed, and certainly before any discussion of the item itself. Simply declaring that a conflict exists and withdrawing from the discussion and any decision making will be all that is required if the trustee is not receiving any material benefit as a result of the conflict of interest. However, if a trustee is receiving a material benefit this will need authority.'

Failure by an employee to declare an interest may lead to disciplinary action being taken. Failure by a board member of Ant-Tribalism Movement to declare an interest may lead to censure by other board members of Ant-Tribalism Movement.

If anyone is not sure what to declare, or whether/when their declaration needs to be updated, they should err on the side of caution. If anyone would like to discuss a potential conflict of interest they should contact their line manager or the Director for confidential guidance.

If a board member of Ant-Tribalism Movement would like to discuss a potential conflict of interest they should contact the Managing Director in the capacity of Company Secretary, in the first instance.

Interests will be recorded in Ant-Tribalism Movement' register of interests, with the paper copies being held by the Director and a scanned copy held on the Shared Drive. The register is an internal document and will be accessible to anyone at Ant-Tribalism Movement.

Data Protection

The information held in the register of interests 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 employees, volunteers and board members act in the best interests of Ant-Tribalism Movement. The information provided will not be used for any other purpose.

What to do when faced with a potential conflict of interest

All employees, volunteers and board members have a responsibility to assess any

situation where a conflict of interest might occur, and, where they have a direct or perceived conflict of interest, to declare this at the earliest opportunity. Further involvement with any discussions will be in line with the rule detailed below.

- A simple majority of non-interested parties is needed in deciding whether the interested party.
 - Can remain in the meeting and listen to the discussion; or,
 - Can remain in the meeting and contribute to the discussion; or
 - Recluses themselves from the meeting for the duration of the discussion.

A person may, however, participate in discussions from which they may indirectly benefit, for example where the benefits are universal to all users.

If anyone fails to declare an interest that is known to either the Executive Director or the Director of Operations or the Chair of the Ant-Tribalism Movement Board, the Managing Director or the Chair will declare that interest at the appropriate time during any discussion.

Decisions taken where a conflict of interest has arisen.

In the event of a meeting, including a meeting of the board or sub-committee of the board, having to make a decision in which a board member of Ant-Tribalism Movement or the Director or employee or volunteer has declared a potential conflict of interest the following rules will apply:

- All decisions by non-interested parties will be made by vote of those attending the meeting, with a simple majority required.
- A quorum, as detailed in any Terms of Reference for that meeting, must be present for the discussion and decision.
- Interested parties will not be counted when deciding whether the meeting is quorate.
- Interested parties may not under any circumstances vote on matters affecting their own interests.

Examples of Conflicts of Interest and how they should be handled

- Any employee, volunteer or board member who has a financial interest in a matter under discussion, should declare the nature of their interest and withdraw from the meeting, unless the meeting has agreed they can contribute to the discussion.

- If an employee, volunteer or board member has any interest in the matter under discussion, which creates a real danger of bias, that is, the interest affects them, or a member of their family or household, more than the generality affected by the decision, should declare the nature of the interest and withdraw from the meeting, unless the meeting has agreed they can contribute to the discussion.
- If an employee, volunteer or board member has any other interest which does not create a real danger of bias, but which might reasonably cause others to think it could influence their decision, they should declare the nature of the interest, but may remain in the meeting, and if the meeting agrees can contribute to the discussion.

If there is any doubt about the application of these rules those involved should consult with the chair of the meeting.

Any employee or volunteer who also has such conflicts of interest when applying for funding or contracts should also declare the interest and the matter be discussed with the Director of Operations (unless the employee is the Director of Operations in which case the matter should be raised with the Executive Director).

All decisions under a conflict of interest will be recorded by the Director of Operations and also reported in the minutes of the meeting. The report will record:

- The nature and extent of the conflict of interest;
- An outline of the discussion;
- The actions taken to manage the potential conflict of interest.
- Where further advice is sought, this should be recorded in the minutes and the actions taken as a result of the advice received.

Where a board member of Ant-Tribalism Movement benefits from any decision taken by the board, this will be reported in the annual report and accounts in accordance with Accounting and Reporting by Charities: Statement of Recommended Practice (revised 2015).

Declaring Gifts

If an employee or volunteer, in the course of their work, receives or is offered a gift or gifts from a current or potential supplier, partner, consultant or any other entity, this should be declared to your line manager, using the form at [appendix 2](#). In the event the true or deemed value is £50 (or local currency equivalent) or more, either singularly or in aggregate, wherever possible the gift will be the property of Ant-

Tribalism Movement and should be sent to the Managing Director. The board will have the ultimate decision-making responsibility regarding the use of a gift.

For the avoidance of doubt, any gift of cash or voucher/s which is/are the equivalent of cash, is/are not to be accepted and should be refused or politely returned. Acceptance of a cash or cash equivalent gift that is not declared will lead to disciplinary action and could lead to dismissal.

In all instances a declaration of gift form should be completed and given to the Director of Operations who will retain it with the register of interests and an electronic copy held on the Shared File. Courtesy gifts of a nominal value are excluded from the need to be reported.

What does UK law say about conflicts of interest regarding trustees?

The Companies Act 2006 states that charity trustees (board members) may not receive any benefit from their charity in return for any service they provide unless they have express legal authority to do so. This legal authority will come either from a clause in the charity's governing document or, where there is no adequate clause in the governing document, from the Charity Commission or the Court.

It is acceptable to repay reasonable out of pocket expenses to trustees. Any costs that are necessary to allow a trustee to carry out his or her duties as a trustee can be classed as expenses and recovered from Ant-Tribalism Movement or met directly by Ant-Tribalism Movement. This may include travel costs and the cost of providing care for a dependent whilst attending a trustee meeting or when undertaking trustee business.

The Articles of Association set out the specific situations where trustees can receive payment from Ant-Tribalism Movement. These Articles have been approved by the Charity Commission.

In brief it states that trustees may receive remuneration for:

1. a) Services rendered.
2. b) The usual professional charges for business done by any trustee who is a solicitor or accountant or other professional as long as no more than 50% of trustees are engaged in work for the charity and any individual withdraws from any meeting where their work, or the work of anyone they are related to, is discussed.
3. c) Ant-Tribalism Movement related expert work as long as this work is subject to a peer review (see section below on peer review) no more than 50% of

trustees are engaged in work for the charity and any individual withdraws from any meeting where their remuneration is discussed.

Ant-Tribalism Movement Declaration of Interests Form

I _____ as a Board/Staff/Volunteer (delete as appropriate) Member of Ant-Tribalism Movement 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 or some other close personal connection
Do you have current employment or any previous employment in which you continue to have a financial interest in?	
Do you hold any other appointments (voluntary or otherwise) e.g. trusteeships, directorships, political or local authority appointments, tribunals etc.?	
Are you, or any member of your immediate family, a member of any professional bodies, special interest groups or mutual support organisations that could conflict with your role at Ant-Tribalism Movement?	
Have you or any member of your immediate family performed consultancy work or engaged in any other paid work since last completing a Declaration of Interest form other than that which has been pre-approved by the Treasurer or Chair of	

Ant-Tribalism Movement?	
Do you, or any member of your immediate family, have any investments in unlisted companies, partnerships and other forms of business, major shareholdings and beneficial interests, hold any position or appointment as a director (executive or non-executive) or Company Secretary in any company whether or not they do business with Ant-Tribalism Movement that could conflict with your role at Ant-Tribalism Movement?	

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 or sooner as the case maybe. 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:

Position:

Date:

Ant-Tribalism Movement – Declaration of Gift

Trustee / Employee / Volunteer [Please delete as appropriate]

Description of gift or hospitality provided	
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Value/Estimated value of gift or hospitality	
Date of offer and date of receipt of gift or hospitality	
Person / body offering/providing the gift or hospitality:	
Person or body receiving the gift or hospitality (other than/as well as you)	
Any relationship (including potential future relationship) which you or Ant-Tribalism Movement has with the person or body offering the gift or hospitality	
Why accepting it was in CR' interests:	
For gifts (including items such as tickets): do you seek permission to retain / use it yourself, or will you pass / have you passed the gift to the Company Secretary or other Director within Ant-Tribalism Movement to be dealt with in an appropriate way?	
For hospitality or gifts already enjoyed, used or consumed: Why was prior approval not sought?	

Signed:

Dated:

Entered in Register

of Interests: Dated:

Reviewed by the Director of Operations: