



## **Conflicts of Interest Policy**

Written **February 2023**

Reviewed **February 2024**

### **1. Conflict of Interests at Blaggrave**

At Blaggrave, we aim to be a transparent and fair organisation. We value lived experience alongside learned 'professional' experience. We strive towards being equitable by addressing how we can support team members to bring their whole selves in to their work as advisers, consultants, staff and Trustees, and this includes bringing their passion and insight. We balance this alongside our legal obligation to act in the best interests of the Trust, and in accordance with our governing document, and we carefully manage situations where there might be a conflict of interest.

Trustees, staff and advisers are asked to declare any situations with which they have a conflict of interest. Conflict of interest can take two forms:

- Fiduciary conflict: when an individual stands to gain financially through our funding
- Connecting relationship: which may arise when an individual's personal or family interests and or loyalties connect with the Trust.

Such conflicts may create problems:

- They can inhibit free discussions
- They can result in decisions or actions that are not in the best interests of the Trust
- Risk the implication that the Trust has acted improperly

It's important to state that we understand conflict of interest to be a statement of fact, not a moral judgement.

### **2. Definitions**

A conflict of interest occurs if an individual could be in a position where they, or someone to whom they are connected, might personally benefit (or be perceived as personally benefitting), either directly or indirectly from decisions made by the Trust. This is not in the interest of the organisation but primarily of the individual.

Conflicts of loyalty can still occur where there is no personal benefit, but where the individual has a personal connection. This includes cases where:

- an individual has an official or ambassadorial role with an organisation.
- an individual has a personal relationship (such as friend or partner) with a staff member at an organisation

There will be times when something that might be seen as a conflict of interest is not in fact a conflict. Blagrove's staff and advisers are made up of individuals whose identity could intersect with the people we seek to serve. Someone's identity should not be used as a conflict of interest. If in doubt they should discuss with their line manager so the situation can be handled in a way that is supportive to the individual.

### **3. Declarations**

The Blagrove Trust operates on the basis of trust. Everyone needs to be mindful of their positions (paid or otherwise) outside of the Trust, their property, stock and any other assets held in a private capacity when making decisions on behalf of the Trust. It is also important to be mindful of family ties, financial ties, friendships and other relationships that could become a conflict of interest when making decisions within our professional roles.

### **4. Recording**

Annually, in November, all staff, and Trustees will be asked to declare their interests by using a simple, online form. Any interests declared using this form are kept on a central register on the one drive. The team has recourse to the register and will decide whether a conflict exists. In situations where the CEO has a possible conflict of interest, the Chair will decide whether a conflict exists.

As part of the onboarding process for advisers, they will be asked to complete the same form.

### **5. Grant making**

Any grant application received from an organisation where a team member has a connection should be declared. Any organisation where a close relation, friend, business partner or other person connected to an associated individual is submitting an application or an associated individual could benefit from the work of the applicant should also be declared.

If advisers working on a specific programme of work with the Trust are aware of a conflict of interest, they should declare an interest to either the Blagrove Trust's associated programme manager, or to the programme's facilitator, so the process can be followed.

In the course of developing new grant programmes, Blagrove Trust staff may invite stakeholders to contribute as early reviewers. In these cases, stakeholders (and the organisations they represent) will **not** be able to apply for funding from the grants scheme under consideration. Instead their time consulting on the programme will be compensated in the usual way. This will be clearly communicated when the opportunity is advertised.

## **6. Suppliers**

The Blagrave Trust will occasionally contract organisations or individuals to deliver goods and/or services. Blagrave's Procurement Guidelines will be followed in establishing suppliers, and opportunities will usually be advertised on the Blagrave Trust's website and other appropriate forums, and be appointed through an open tendering process. When a member of staff has an interest in an organisation or a connection to an individual supplying services to the Trust, the staff member should declare an interest through their line manager and using the interests form.

## **7. When a conflict of interest/duty has been identified**

As stated, those most connected with our work through lived experience, are often those most able to bring insight and learning. Even in cases where a conflict has been identified, we therefore welcome active participation by the person involved so long as the conflict is clearly declared. The following procedures will be undertaken:

- The discussions and decisions made (including the notified conflict of interest) will be fully recorded at the meeting
- The individual will remove themselves from the meeting before any decisions are discussed or taken. Parties will be given an opportunity to discuss without the conflicted person present.
- Once a decision has been made the conflicted individual will be informed of the decision at the appropriate moment.

## **8. Responsible persons**

The Blagrave Trust's CEO is responsible for ensuring implementation and compliance of this policy by all Trustees, staff and advisers with support from the Finance and Governance Officer.

## **9. Review of this policy**

This policy was reviewed in February 2024. This policy will be reviewed annually.

## **Appendix 1**

Definition of associated individual

- any person who shares a financial household with the individual or is financially dependent on them
- members of the same family or household who may be expected to influence, or be influenced by the individual