

## **CONFLICT OF INTEREST POLICY**

**Approved by:** ECC Board - June 2018

The purpose of this policy is to protect the integrity of ECC's decision-making process, to enable Members to have confidence in the organisation's integrity, and to protect the integrity and reputation of ECC and Directors.

All Directors of ECC will strive to avoid any conflict of interest between the interests of ECC on the one hand, and personal, professional, and business interests on the other.

A conflict of interest may arise when a Director's personal interests or interests which they have in another body clash or appear to clash with those of ECC.

In the interests of transparency and good governance, ECC has agreed the following process to deal with a conflict of interest should one arise:

A conflict may appear in a number of different forms:

- Direct financial gain - for example from involvement which provides financial benefit to the Director in an organisation that provides paid for services to ECC;
- Indirect financial gain - for example from the involvement of a Director's spouse or partner which provides financial gain to that individual in an organisation that provides paid for services to ECC;
- Non-financial gain - for example through involvement with another organisation (other than a member or associated member) that contracts with ECC for paid for services;
- Conflict of loyalties.

Examples of conflicts of interest may include:

1. A Director who is also an employee of a Member may be faced with a decision in a Board meeting regarding whether subscriptions or fees for Members should be increased.
2. A Director who is related\*\* to a member of staff where there is decision to be taken on staff pay and/or conditions.
3. A Director who is also on the Board of another organisation that is in competition with ECC.
4. A Director who:
  - has shares in an organisation that may be awarded a contract to do work or provide services for or with ECC; or
  - is a Director, partner or employee of such an organisation; or
  - is related to someone who is\*\*<sup>1</sup>.

All Directors are responsible for declaring any or potential conflicts of interest by reporting their involvement in other organisations which may result in a conflict to the Business and Finance Manager at the start of each academic year the form given in Appendix 1 at the start of each academic year. The register of interests will be reviewed by the Board annually and it will be the responsibility of the Chair to resolve any actual or potential conflicts of interest. A record of

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<sup>1</sup> \*\* A relative may be a child, parent, grandchild, grandparent, brother, sister, spouse or civil partner of the Director or any person living.

declarations will be maintained and made available on request and only to Directors of HR (or similar) in member organisations.

Directors must also declare their interest in any item on a Board or sub-group agenda at the start of the meeting. If in doubt, the potential conflict must be declared anyway and clarification sought. This includes avoiding conflicts of interest identified by the Director or staff member as well as the perception of conflicts of interest. The 'objective test' is whether a member of the public, with knowledge of the relevant facts, would reasonably regard the interest as so significant that it is likely to prejudice the Director's discussion or decision making in their role as a member of the ECC Board. A note of the declaration will be made in the minutes of the meeting.

A Director with a declared conflict of interest may participate in the discussion at the discretion of the Chair, but may not vote on that matter.

**APPENDIX A**

**Declaration of interests form**

I, ..... (Name), hereby declare that I have the following / no interests (*delete as appropriate*) to declare that are relevant or material to the Board of The Educational Competencies Consortium

Signed		Date	
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**List of interests**

Name of organisation where interest is held or individual with whom the conflict of interest arises	Position held or Nature of interest

If you have any additional interests that may conflict with your role as a Director of ECC, please note these below:

Position held or Nature of interest

Please note that should your circumstances change, you must notify the Chair of the Board at the time the change occurs.