

First Step Training Conflict of Interest Policy

Version 7

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Definition

A 'conflict of interest' arises when the best interests of an individual are, or could be, different from the best interests of the company itself.

This may be something that affects the individual directly, or indirectly, through a family member or friend or business partner.

Statement of Intent

First Step Training is committed to ensuring its decisions and decision-making processes are, and are seen to be, free from personal bias and do not unfairly favour any individual connected with the company.

Policy

It is the policy of *First Step Training* to:

- Ensure every trustee understands what constitutes a conflict of interest and that they have a responsibility to recognise and declare any conflicts that might arise for them.
- Document the conflict and the action(s) taken to ensure that the conflict does not affect the decision making of the organisation

Procedure

When a member of staff identifies that they have a potential conflict of interest they must:

- Declare it as soon as they become aware of it
- Ensure it is entered and documented in the appropriate manner
- Not take part in any management discussions relating to the matter
- Not take part in any decision making related to the matter
- Not be counted in the quorum for decision making related to the matter

In the interests of frank and open discussion, a member of staff affected by a conflict of interest must leave the room while related discussion/decision making is taking place, unless there is good reason for them to stay.

The minutes should state:

- The declared conflict
- That the member of staff left the room, or the reason they were asked to stay
- That the trustee took no part in discussion or decision making on the matter
- That the meeting was quorate (not counting the affected trustee)
- Any other actions taken to manage the conflict



If a member of staff is unsure what to declare, they should err on the side of caution and discuss the matter with the line manager for confidential guidance.

