

Declaration of Interests Policy

Date approved by Connected Together Community Interest Company (CTCIC) Board	May 2018
Responsible Person	Mary Clarke
Next revision due	May 2020
Staff/volunteer training delivered	Included in Staff and Volunteer Induction and the CTCIC Volunteer Handbook
This policy covers Connected Together Community Interest Company (CTCIC) and all its organisations, contracts and subsidiaries, such as Healthwatch Northamptonshire (HWN), Healthwatch Rutland (HWR).	

Responsibilities

1 Connected Together Community Interest Company (CTCIC) Board

Has overall responsibility for volunteers within CTCIC, its organisations, contracts and subsidiaries, including Healthwatch Northamptonshire (HWN), Healthwatch Rutland (HWR) and any other organisations CTCIC is formally contracted to manage.

2 CTCIC Chief Executive Officer (CEO)

The CTCIC board has delegated to the CEO the responsibility for developing a strategy, policies and procedures for volunteering at CTCIC and to ensure these are implemented effectively.

3 CTCIC staff and volunteers

All CTCIC staff and volunteers are required to read and implement the Volunteer Strategy, supporting policies and procedures.

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1. Introduction

Central to the proper conduct of the public business is the need for CTCIC board members, staff, volunteers and members and volunteers of all its organisations, its contracts and subsidiaries (including Healthwatch Northamptonshire (HWN), Healthwatch Rutland (HWR) and any other organisations CTCIC is formally contracted to manage), to follow the *seven principles* of public life as set out by the Nolan Committee on Standards of Public Life: selflessness, integrity, objectivity, accountability, openness, honesty and leadership. Failure to do so may provide a risk to the reputation of CTCIC or leave board members or volunteers open to suspicion of impropriety in their conduct of CTCIC business.

All board members, staff or volunteers involved in providing advice, or making judgements on behalf of CTCIC, its organisations, contracts and subsidiaries should ensure that they act impartially in accordance with the principles of public life. Good practice requires any board member or volunteer who has a material interest, actual or perceived, either directly or through a partner, spouse or close relative (e.g. brother, sister, children etc.), in any CTCIC matter to declare that interest.

The purpose of this policy is to set out the principles for minimising and managing potential conflicts of interest, perceived or otherwise and, in so doing, provide protection to CTCIC, its board members, staff and volunteers. In establishing this policy, the CTCIC aims to achieve the effective management of conflicts of interest without over-prescriptive regulation.

2. Policy objectives

To ensure best practice by:

- (i) ensuring those individuals covered by the policy make decisions free from bias;
- (ii) guarding against conflicts of interest that may arise as a result of the positions held by individuals
- (iii) protecting CTCIC, and those individuals covered by the policy, against impropriety, or the appearance of impropriety, including reputational risk.

3. Individuals covered by the policy

All board members, staff and volunteers advising and making judgements/decisions on behalf of CTCIC, its organisations, contracts and subsidiaries. Since this cannot be fully anticipated in advance, all board members, staff and volunteers will be required to complete a **Declaration of Interests form** and regularly update it. Information from the Declaration of Interests form will be added to the Register of Interest Form by the Volunteer Lead.

The conduct of all members of staff must reflect the Nolan Principles set out above.

4. Roles and responsibility

- It is the responsibility of the CEO to ensure board members, staff and volunteers are aware of, and comply with this policy.
- The Volunteer Lead will be responsible for the actual operation of the policy with volunteers and will maintain and update the **Register of Interests** and ensure that the **Declaration of Interests Form** is completed on appointment.
- It is the responsibility of the Volunteer Lead to be aware of, and to act in accordance with this policy, where a potential conflict of interest arises.
- It is the responsibility of individual board members, staff and volunteers to ensure they declare any potential conflict of interest. Such declarations should describe the interest clearly and state whether it carries, either directly or indirectly, financial interests; such declarations should be updated on a regular basis.
- It is the responsibility of the CEO to periodically review the Register of Interests.

6. Declaration of interests

- On appointment to CTCIC as a staff member, board member, or to the staff team or board of any of its organisations, contracts and subsidiaries, individuals will be asked to read and comply with this policy and complete a Declaration of Interests form, included as Appendix 1, referring where necessary, to the Guidance Notes included as Appendix 2.
- Any changes to the circumstances of board members, staff or volunteers, including new interests, should be declared at the earliest opportunity to the Volunteer Lead.
- Declarations may also need to be made during meetings, or during business contract developments, and this is covered in detail in Sections 7 and 8.

7. Declaration of interests at meetings

- During the course of a meeting, board members, staff and volunteers need to be vigilant in raising any conflict of interest, as soon as they become aware of it, so that appropriate action can be taken.
- The Chair of the meeting will advise on the action required to resolve any conflict of interest which becomes apparent at a meeting. Depending on the nature of the interest, the Chair will decide whether the individual should leave the room for a particular item or remain, but take no part in the discussion.
- Actions taken in relation to declaration of interests will be recorded in the minutes.

8. Declaration of interest at induction and during business contract development

- CTCIC regularly competes for new business and contracts, so board members, staff and volunteers of CTCIC, or any of its organisations, contracts and subsidiaries must notify the Chair during meetings, or the Volunteer Lead or Line Manager at induction, and/or during any business or contract development of any potential conflict of interest, so that appropriate action can be taken.

9. Resolution of Declaration of interests

- Potential conflicts of interest at meetings will normally be resolved through the individual concerned not participating in the relevant discussions, or any subsequent discussions, and having restricted access to information.
- An interest declared in respect of making judgements/decisions on behalf of CTCIC should be notified to the Volunteer Lead, CEO or Chair of the meeting.
- The issue should be fully considered and the board member, staff or volunteer advised accordingly; someone with an interest should be excluded from such decisions.
- The CTCIC Chair or CEO will consider the appropriate course of action in the case of a potential or perceived conflict of interest regarding business contract development.

10. Updating the Declaration of Interests

- Board members, staff and volunteers will be able to update the Register of Interests through the Volunteer Lead, who will collate information provided on the Declaration of Interests Form.
- The Declaration of Interests must be updated on an annual basis or more frequently depending on circumstances.

Appendix 1

Declaration of Interest Form

Name:		
Position within CTCIC, including its organisations, contracts and subsidiaries, (including Healthwatch Northamptonshire, and Healthwatch Rutland).	Along with your position, please state the name of the organisation within which you hold a role.	
Interests		
Type of Interest	Details	Personal interest or that of a family member, close friend or other acquaintance?
Directorships, including non-executive directorships, held in private companies or PLCs		
Ownership or part ownership of private companies, businesses or consultancies likely or possibly seeking to do business with the CTCIC, its organisations, subsidiaries and contracts.		
Shareholdings (more than 5%) of companies in the field of health and social care.		
Positions of authority within an organisation (e.g. charity or voluntary organisation) in the field of health and social care.		

Any connection with a voluntary or other organisation contracting for NHS Services		
Research funding/grants that may be received by the individual or any organisation they have an interest or role in.		
Other specific interests - e.g. users of health services.		
Any other role or relationship which members of the public could perceive would impair or otherwise influence the individual's judgement or actions in their role within CTCIC, its organisations, subsidiaries and contracts.		

Declaration

To the best of my knowledge and belief, the above information is complete and correct. I undertake to update as necessary the information provided and to review the accuracy of the information provided regularly and no longer than annually. I give my consent for the information to be used for the purposes described in the CTCIC Constitution and Policies and Procedures, and published accordingly.

Signed:

Print:

Date:

Appendix 2

Guidance on which interests must be declared

Staff, volunteers, and members of the Board of both Connected Together CIC and all its organisations, contracts and subsidiaries, including HWN and HWR are required to register the following:

- Current employment or self-employment, or any previous employment or self-employment in which they continue to have a financial interest.
- Appointments (voluntary or otherwise) e.g. trusteeships, directorships, local authority membership, tribunal membership, school governorships, Rotary Club, etc.
- Membership of professional bodies, special interest groups or mutual support organisations where this has, or may have, a direct relationship with CTCIC and any of its organisations, contracts and subsidiaries.
- Investments in unlisted companies, partnerships and other forms of business, major shareholding, e.g. more than 1% of issued capital and beneficial interest.
- Gifts or hospitality offered to you whether this was declined or accepted. Where any such gift, etc., was offered to a close family member and may be reasonably construed as being directly or indirectly offered to you, this should be included.
- Any contractual relationship with CTCIC and any of its organisations, contracts and subsidiaries.
- Any matter not specified above which a reasonable third party would consider of clear and material relevance, actual or potential, to the Board Member's official role.
- Office or employment held in related bodies (public or private).

Clarification

- 'Close family member': this should be construed as meaning wife/husband/partner/children of the relevant Board member.
- 'Pecuniary interests' include both interests which arise as a charity beneficiary and those which arise from a business relationship.
- 'Related body' includes non-charitable subsidiaries of charities, fundraising organisations and other organisations with significant commercial, pecuniary or compatible interests involving charities.

Any changes to the provided information should be notified so that the records can be kept up to date