

St Cuthbert's Society Junior Common Room (1168134)

Conflict of Interest Policy (General)

POL007

Approved/issue	June 2019	Locations	Website Trustee Share Drive
Review Cycle	Annual		
Next review due	June 2020	Circulation details	Executive Committee Trustees
Review by	Trustee Legal Committee		

1. Introduction

- 1.1. St Cuthbert's Society Junior Common Room ("the JCR") is a registered charity with a duty to ensure the highest standards of behaviour and to prevent, identify and act upon corruption, fraud and irregularity.
- 1.2. Therefore the JCR expects its employees, volunteers and trustees to commit to upholding and promoting these standards.
- 1.3. The purpose of this policy is to detail how conflicts of interest are controlled. The policy explains what is meant by the term conflict of interest, details measures and procedures that should be taken to prevent such conflicts occurring and outlines how any potential conflict of interest should be managed.

2. Definition

- 2.1. A conflict of interest is defined as any financial or other personal interest that an individual may have in any relationship or proposed relationship between the JCR and an external body, or between individuals or groups within the JCR.
- 2.2. It is up to each individual to decide whether a conflict of interest could exist and, if so, to declare the conflict. When deciding on such matters, consideration must be given to how things could appear to others and, in all cases, individuals should err on the side of caution, declaring an interest if there is any possibility that a conflict of interest may exist to the responsibilities of the position being applied for.

3. Personal Relationships

- 3.1. Relationships between members, employees, volunteers and trustees could lead to a conflict of interest. For example, a personal relationship between the JCR President and an Executive Committee member could lead to a suspicion of favouritism or preferential treatment when making decisions.
- 3.2. Such relationships should be declared. Declarations of such relationships will need to be handled in a more sensitive manner and issues of confidentiality will need to be considered more carefully. The Trustee Board will advise on such matters.
- 3.3. The JCR discourages sexual relationships between employees and JCR members. Given the imbalance of power between employees and JCR members, it is the expectation of the JCR that its employees will not abuse their position in any way, including by making sexual advances, pressuring students into sexual relationships, or through any form of sexual harassment or coercive control.
- 3.4. Such a relationship could compromise the trust and confidence that underpins the supportive environment the JCR offers and that may involve or lead to conflicts of interest, abuse of power or coercive control.
- 3.5. The JCR also recognises, however, that people do become attracted to and involved with one another, and that as adults we have a right to sexual relationships of our own choosing.
- 3.6. If a consensual employee-JCR member relationship becomes established, it is the responsibility of the employee to disclose a relationship with a student at the earliest possible opportunity. This protects employees by allowing them to demonstrate that the relationship does not entail a conflict of interest and confirm that the relationship has not resulted from coercive behaviour.
- 3.7. Such a disclosure should be made to the relevant Supervisor or JCR President and would be treated as confidential.
- 3.8. Failure by a member an employee to disclose an employee-JCR member relationship could lead to disciplinary action being taken against the employee.

- 3.9. After disclosure, appropriate action will be taken by the Supervisor or JCR President to ensure arrangements and protections are in place to prevent conflicts of interest and abuse of power.
- 3.10. The Trustee Board will be available to offer advice and information to individuals about this policy.

4. Gifts and Hospitality

- 4.1. Employees, volunteers or trustees must not use their position or employment for personal gain and should act at all times in good faith and in the interests of the JCR.
- 4.2. As a general policy the JCR does not believe that the receiving of gifts or extensive hospitality is appropriate to the efficient conduct of its business. There are however limited exceptions to this policy.
- 4.3. Any Employee, volunteer or trustee who is given one or more gifts (actual or potential) with a total value over £10, including hospitality, by a business contact (e.g. customer or supplier actual or potential), must disclose the fact of the gift and its nature to Trustee Board, who in turn will inform the JCR President. If a gift is offered to the Trustee Board or JCR President, they should declare it to the other and at the next available meeting of the Trustee Board.
- 4.4. If the Trustee Board and the JCR President decide that the gift is excessive or could be construed as a bribe, it will be returned to the donor with a suitable covering letter. Otherwise the recipient will be allowed to retain the gift. In the case of the JCR President, the trustees will make the decision.
- 4.5. Promotional gifts such as stationery, which are not of significant value are exempt from this policy and need not be disclosed.
- 4.6. In certain circumstances it may be appropriate to receive reasonable hospitality from the suppliers or business contacts and similarly for the JCR to entertain contacts. The Trustees will decide when it is appropriate.
- 4.7. A record of all gifts, hospitality received and hospitality given over the value of £10 will be kept by the Trustees and shall be inspected by the appointed auditors annually.
- 4.8. Failure to disclose gifts may constitute a disciplinary offence, which will be dealt with in accordance with the appropriate procedures. If the undeclared gift was of significant value, and the recipient is in a position to influence business dealings with the donor, the offence may be treated as gross misconduct.
- 4.9. Declarations should be made providing as much detail as possible, via e-mail correspondence between the Chair of the Trustee Board and the JCR President and the individual making the declaration. As a minimum, all declarations should record:
 - The name of the individual making the declaration,
 - The date that the declaration was made,
 - The nature of the conflict of interest,
 - Details of the external body or other individual concerned in the conflict, and
 - Details of any financial or other benefits received by the individual making the declaration.

5. Implementation and Monitoring

- 5.1. The Chair of the Trustee Board and President will ensure that this policy is brought to the attention of employees, volunteers and trustees and that individuals are encouraged to declare conflicts of interests.

- 5.2. The Trustees will monitor the implementation of this policy and is responsible for advising employees and volunteers of any further measures required to control the risk of fraud, corruption and irregularity.
- 5.3. Breach of this policy may lead to disciplinary action. Any disciplinary action will be dealt with in accordance with the Disciplinary Policy.

6. Approval and Review

- 6.1. This Conflict of Interest Policy was prepared by the JCR President on behalf of the JCR Trustee Board.
- 6.2. This policy will be reviewed every 3 years by the Trustee Board in consultation with relevant parties including the JCR President and Executive Committee Members.

This Conflict of Interest Policy has been approved by the JCR President and Trustee Board.

Signed Tim Chapman

Signed Amy Kuner

Dated June 29th 2019

Dated June 29th 2019

Chair, JCR Trust 2018-2019

JCR President 2018-19