**Principle**

Committee Members have an obligation to act in the best interests of Little Buds, and in accordance with Little Buds governing document. [Staff and volunteers have similar obligations.] Conflicts of interests may arise where an individual’s personal or family interests and/or loyalties conflict with those of Little Buds.

Such conflicts may create problems; they can:

* Inhibit free discussion;
* Result in decisions or actions that are not in the interests of [the governing body]; and
* Risk the impression that Little Buds has acted improperly.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

**Policy**

Accordingly, we are asking committee members and staff to declare their interests are provided for this purpose.

To be effective, the declaration of interests needs to be updated at least annually, and also when any changes occur.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact Little Buds committee secretary or Chairperson for confidential guidance. Interests will be recorded on the governing body’s register of interests, which will be maintained by Little Buds secretary. The register will be accessible by parents/staff/committee of Little Buds.

**Data Protection**

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that committee members and senior staff in Little Buds, act in the best interests of Little Buds. The information provided will not be used for any other purpose.

**Procedure**

If you are a user of Little Buds services, or the carer of someone who uses Little Buds services, you should not be involved in decisions that directly affect the service that you, or the person you care for, receive(s). You should declare your interest at the earliest opportunity and withdraw from any subsequent discussion. The same applies if you face a conflict for any other reason. You may, however, participate in discussions from which you may indirectly benefit, for example where the benefits are universal to all users, or where your benefit is minimal.

If you fail to declare an interest that is known to Little Buds secretary and/or the chairman Little Buds the secretary and chairman will declare that interest.

**Decisions taken where a board member or member of staff has an interest**

In the event of the committee having to decide upon a question in which a Committee Member or member of staff has an interest, all decisions will be made by vote, with a simple majority required. A quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate.

Interested board members may not vote on matters affecting their own interests. They may participate in the discussion but not the decision-making process.

All decisions under a conflict of interest will be recorded by Little Buds secretary and reported in the minutes of the meeting. The report will record:

* The nature and extent of the conflict;
* An outline of the discussion;
* The actions taken to manage the conflict.

A *de minimis* exemption applies to contracts less than £500 in value. Random checks against the register of interest will be made on the award of contracts below this value. If the cumulative value of a series of small contracts exceeds £500, the Committee Member will operate the policy used for individual contracts over that sum.

The *de minimis* exemption does not apply to contracts of employment with Little Buds.

Independent external moderation will be used where conflicts cannot be resolved through the usual procedures through an EGM.

(*Organisations should add any further requirements that relate to the nature of the organisation’s work*.)

**Managing contracts**

If you have a conflict of interest, you must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.

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**Monitoring**

This policy will be reviewed annually by the management team to ensure it

remains fit for purpose.

This policy was adopted by Little Buds management team.

Signed: …………………………………………………………………………………..

(on behalf of the management team)

Position: …………………………………………………………………………………..

Date: …………………………………………………………………………………..

Reviewed on:

Date: ……………… Signed: …………………………………………..

Date: ……………… Signed: …………………………………………..

Date: ……………… Signed: …………………………………………..