



Declaration of Interests Policy

Date approved by the Connected Together CIC Board	Ratified by the CTCIC Board on 24/06/2024
Author/Responsible Person	Michelle Wright
Next revision due	June 2027
Staff/volunteer training delivered	Included in Staff and Volunteer Induction and the CTCIC Volunteer Handbook
Date sent to staff	24/06/2024
	This policy covers Connected Together CIC and <i>all</i> its contracts and managed organisations, for example, Healthwatch North Northamptonshire and West Northamptonshire (HWNW) and Healthwatch Rutland (HWR).
Checked for rebranding	Michelle Wright – 28/02/2024
Signed off by CEO	Kate Holt – 04/03/2024
Checked By	Susan Hills –06/03/2024

Responsibilities

1 Connected Together Community Interest Company (CTCIC) Board

Has overall responsibility for volunteers within CTCIC, its organisations, contracts, and subsidiaries, including Healthwatch North Northamptonshire and West Northamptonshire (HWNW), 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 strategy, policies, and procedures for volunteering at CTCIC and ensuring 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 to ensure any conflicts of interest will be identified

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 HWNW and 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 pose 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 because 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 Interest 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

5. 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

6. Declaration of interests at meetings

- During 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

7. 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

8. 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. Anyone 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

9. 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 local Healthwatch).	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
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 at least 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 Boards of Connected Together CIC and all its organisations, contracts, and subsidiaries, including HWNW 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 staff member's or volunteer'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