

**Date: 19 July 2016**  
**For: Trustees and Senior Staff**



## **Conflict of Interest Policy**

### **Introduction**

This Policy applies to the Trustees and Senior Staff of Ride High. Senior Staff includes, but is not limited to, the Operations Manager, Children's Manager and Marketing Manager.

Trustees have a legal obligation:

- to act in accordance with the governing document, and
- to act in the best interests of Ride High.

Senior Staff have similar obligations, although these may not be legal requirements.

This Policy is designed to avoid situations where there may be a conflict of interest, and to manage situations where a conflict of interest arises. It also aims to protect both Ride High and individuals from any appearance of impropriety.

Conflicts of interest arise where a Trustee/Senior Staff member's personal, business or family interests and/or loyalties may (or may appear to) influence or affect that person's decision-making in relation to Ride High. Such conflicts may create problems. They can, for example:

- inhibit free discussions;
- result in decisions or actions that are not in the best interests of Ride High (and which may therefore be challenged and ultimately declared void);
- risk giving the impression that Ride High has acted improperly.

### **Declaration of interests**

Trustees and Senior Staff must declare their interests, and any gifts or hospitality received in connection with their role in Ride High. A Declaration of Interests form is available from the Secretary of Ride High for this purpose, listing the types of interest that should be declared. This form must be updated annually and also when any changes occur.

If a Trustee/Senior Staff member is not sure what to declare (s)he should contact the Secretary of Ride High for guidance.

If a Trustee or Senior Staff member fails to declare an interest that is known to another Trustee or Senior Staff member, that Trustee or Senior Staff member will declare the interest.

### **Data protection**

Information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998 and our Data Protection Policy. Data will be processed only to ensure that Trustees and Senior Staff act in the best interests of Ride High and for no other purpose.

### **Decision taking**

In the event of the Trustees having to decide upon a question in which a Trustee or Senior Staff member has an interest (including as a carer of someone who uses Ride High services), the Trustee/Senior Staff member should declare their interest at the earliest opportunity (if (s)he hasn't done so already). If a Trustee, (s)he should withdraw from any subsequent discussion on that issue and shall not take part in any vote in connection therewith. In the event of a tied vote the Chair shall have a casting vote. A quorum must be present for the discussion and vote, and any interested Trustee shall not be counted in deciding whether the meeting is quorate.

If a Trustee or Senior Staff member has a conflict of interest they must not be involved in managing or monitoring a contract in which they have an interest. Monitoring arrangements for such contracts will include provision for an independent challenge to bills and invoices, and termination of the contract if the relationship is unsatisfactory.

Independent external moderation will be used where conflicts of interest cannot be resolved via the usual procedures.

### **Reporting**

A Register of Interests will be maintained by the Secretary of Ride High. This Register will record the interests of Trustees and Senior Staff and will also be used to record all gifts with a value over £50 received by Trustees and Senior Staff. This Register will be accessible by Trustees, Senior Staff and members of Ride High on request to the Secretary of Ride High.

All decisions concerning a conflict of interest will be recorded by the Secretary of Ride High and reported in the minutes of the meeting. The report will record:

- the nature and extent of the conflict of interest;
- an outline of the discussion;
- the actions taken to manage the conflict.

Where a Trustee benefits from the decision, this will be reported in the Annual Report and Accounts in accordance with the current Charities Statement of Recommended Practice.

All payments and benefits in kind to Trustees will be reported in the Annual Report and Accounts with amounts for each Trustee listed for the year in question.

Where a Trustee or Senior Staff member is connected to a party involved in the supply of a service or product to Ride High, this information will be fully disclosed in the Annual Report and Accounts.

**Training and awareness**

A copy of this Policy will be shown to all Senior Staff members, and each must sign the list attached to the original to indicate they have read and understood it.

**Approval and review**

This Conflict of Interest Policy was approved at a Board Meeting of the Trustees on 19 July 2016. It will be reviewed each September thereafter, or more frequently if appropriate.

Signed.....

Date.....