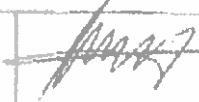





Conflict of Interest Policy

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| Policy Number | HAPC/POL/CI1 | | |
| Previous review date | August 2018 | Board of trustees | |
| Next Review date | July 2020 | Board of trustees | |

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|----------------------|------------------|
| Policy Owner | People & Culture |
| Key responsibilities | People & Culture |
| Associated documents | NA |

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|---------------------|-----------|--------------------|---|
| Approver Authorizer | July 2019 | Board of Directors |  |
| Reviewed on | July 2019 | Board of trustees |  |



Conflict of Interest – Personal Relationships Policy

1. Introduction

Human Appeal is an incorporated UK charity working across the globe to strengthen humanity's fight against poverty, social injustice and natural disaster, through the provision of immediate relief and establishment of self-sustaining development programmes. Our vision is to contribute to a just, caring and sustainable, world free of poverty. Human Appeal does this by raising money to fund immediate and long-term sustainable solutions, and empower local communities.

2. Policy Statement

2.1. A conflict of interest occurs when a person's personal interest or loyalties to another person or organisation affect, or appear to affect, or could reasonably be considered to affect, the impartiality, judgement, or effectiveness expected from an individual in their role at Human Appeal.

2.2. Human Appeal wishes to ensure that the decisions, judgements and effectiveness of all working for, or on behalf of, Human Appeal are, and appear to be, unbiased, impartial, and solely and wholly for the benefit of the charity. Individuals working for, and on behalf of, Human Appeal shall not affect, or appear to affect, the impartiality, judgement or effectiveness expected from them in their role, and abuse that relationship to the detriment of others, or be in apposition where they are perceived by others to be in position to do so.

3. Policy Objective

3.1. Relations between existing staff, Trustees, volunteers and contractors

3.1.1 Significant social relationships between members of the same team are generally discouraged, because they may consciously or subconsciously affect decision making. However, it is recognised that strictly professional relationships can naturally lead to social relationships, and even the forming of close personal relationships.

3.1.2 Those whose personal interest or loyalties to a person or organisation affect, appear to affect, or could reasonably be considered to affect, the impartiality, judgement or effectiveness expected of them in their role, are required to ensure that decision making cannot be compromised, by making an early declaration to People & Culture (PC). Where such conflicts of interest exist, or appear to exist, those working for, or on behalf of Human Appeal shall not directly or indirectly line manage or supervise those members of staff, volunteers, contractors, suppliers nor make decisions nor participate in the decision-making process relating to those categories.

4. Scope

This policy applies to all persons working for, or on behalf of, Human Appeal regardless of their contractual status.

5. Roles and Responsibilities

5.1. People & Culture (PC) are responsible for conducting the following assessment.

5.1.1 Whether the situation affects, or appears to affect, or could potentially affect any of the individual's decisions for Human Appeal.

5.1.2 Whether an individual's family member (current or former family relationships are included – it is recognised even after divorce close bonds can be maintained between



Conflict of Interest – Personal Relationships Policy

individuals), or some other person with whom the individual has a close personal relationship, gains or could gain unwarranted benefit because of the relationship with the individual working with Human Appeal or vice-versa.

- 5.1.3** An assessment on how the situation is perceived by or appears to a colleague, donor, supplier, member of the public or the media.
- 5.1.4** If an individual has a close personal relationship with someone, and has the authority to influence their contractual terms, position in the organisation, safety, pay, promotions, career development and disciplinary outcomes, then there is a conflict of interest that must be declared to PC.

6. Policy Provisions

6.1. Managing a conflict of interest

- 6.1.1** The individual shall discuss the situation with their line manager and must declare the situation to PC. PC and the line managers are responsible for dealing with the conflict of interest, putting in place processes and safeguards to manage or prevent the situation affecting decision making or the work of Human Appeal.
- 6.1.2** The executive directors must collectively come to a decision on how to prevent and resolve current conflicts of interest. The CEO or COO shall not hold that position if they are regarded as having conflict of interest with close relationships, whether family or friends, in Human Appeal.
- 6.1.3** Procedures such as the whistle-blowing policy and process (**WBPVER05-072019/WBPVER01-SEP18**) should be used to report any breaches of this policy.

6.2 Recruitment, hire of consultants, contractors and suppliers

Human Appeal employees at times recommend people from outside the organisation for vacancies. Human Appeal supports this, subject to two criteria:

- 6.2.1** The recruiting manager (i.e. any person responsible for the hiring of a position), or the director of the recruiting manager, shall not recommend a relative or someone they have a close personal relationship with, if they would be managed by them or one of their direct reports. For the position of CEO and COO (or other equivalent roles), there should be no recommendations as they will be managed by the direct reports of the CEO or COO.
- 6.2.2** The recruiting manager, or the director of the recruiting manager, should never be involved in the process of recruiting a relative or an individual with whom they have a close personal relationship with.

7. Sanctions

- 7.1.** Actual or suspected breaches shall be investigated thoroughly and impartially. Employees found to be in breach may be subject to disciplinary action which may result in their dismissal.

8. Policy Review

This Policy will be reviewed on a regular basis to ensure continuing appropriateness.