

Disclosure of Interest Policy and Procedure	
Publication Date: May 2019	Applies To: All Committee and Sub Committee Members
Responsible Person: President	Scheduled Review Date: At least once every three years as determined by the Management Committee
Approved By: Committee meeting 6 May 2019	Author: Policy Sub-committee

INTRODUCTION

The Management Committee of Southlakes U3A is committed to high standards of ethical conduct and accordingly places great importance on making clear any existing or potential conflict of interest.

PURPOSE

This policy has been developed to provide a framework for:

- all Management Committee Members in declaring conflicts of interest; and
- the Management Committee, when determining how to deal with situations of conflict

POLICY

A conflict of interest may occur if a financial interest or a relationship influences or appears to influence the ability of a Committee member to exercise objectivity.

The Southlakes U3A Management Committee places great importance on making clear any existing or potential conflicts of interest. All such conflicts of interest shall be declared by the member concerned. All financial conflicts of interest, as defined by statute, shall be documented in the Committee's Disclosure of Interest Register.

Where a Committee member has an actual or perceived financial conflict of interest, as defined by statute, that Committee member shall not initiate or take part in any Committee discussion on that topic (either in the meeting or with other Committee members before or after the Management Committee meetings), unless expressly invited to do so by unanimous agreement by all other members present.

Where a Committee member has an actual or perceived financial conflict of interest, as defined by statute, that member shall not vote on that matter.

Where a Committee member has an actual or perceived conflict of interest related to their relationship with a volunteer of the Association, or any other person having dealings with the Association, that Committee member shall not initiate or take part in any Committee discussion on that topic (either in the meeting or with other Committee members before or

after the Management Committee meetings), unless expressly authorised to do so by the Committee.

Where a Committee member has an actual or perceived conflict of interest related to their relationship with a volunteer of the organisation, or any other person having dealings with the organisation, that Committee member shall not vote on that matter, unless expressly authorised to do so by the Management Committee.

The Committee may further supplement the definition of conflict of interest from time to time if it so wishes, and may specify the procedures to apply in such cases.

Committee members are not barred from engaging in business dealings with the organisation, provided that these are negotiated at arm's length without the participation of the Committee member concerned.

A Committee member who believes another Committee member has an undeclared conflict of interest should specify in writing to the Secretary the basis of this potential conflict.

RESPONSIBILITIES

The President is responsible for bringing this policy to the attention of prospective Committee members.

All Committee members are responsible for respecting this policy.

PROCEDURES

Before a Committee member begins their service with the Association, they shall file with the Secretary a list of their principal business activities, as well as involvement with other charitable and business organisations, vendors or business interests, or with any other associations that might produce a conflict of interest. This information should be documented in the Conflict of Interest Register.

Committee members shall also file with the Secretary notification of any relationships between themselves and any volunteer of the organisation, or any other person having dealings with the association that might reasonably give rise to the perception of a conflict of interest.

Further, members shall declare any conflicts of interest of which they become aware either at the start of the Management Committee meeting concerned or when a relevant issue arises. The nature of this conflict of interest should be entered in the meeting Minutes. The nature of the conflicts of interest should also be documented in the Conflict of Interest Checklist.

Where a conflict of interest or potential conflict of interest, as defined below, is identified and/or registered, the Committee member concerned shall leave the room as soon as that item comes up for discussion. The concerned Committee member shall not vote on that issue, nor

initiate or take part in any Committee discussion on that topic (either in the meeting or with other Committee members before or after the meetings), unless expressly invited to do so by unanimous agreement by all other members present. The Committee member's abstinence should be recorded in the meeting minutes.

If a person declares themselves to have an existing or potential conflict of interest, confidentiality will be respected. If a person alleges that another person has a conflict of interest, whether existing or potential, and that person does not agree, the Committee will resolve the allegation and decide what action shall be taken by a vote.

If the Association has a 'conflict of interest' it is defined as:

- a) the immediate family or business connections of a Committee member, or any person with whom the Committee member is in a close relationship, stands to gain financially from any business dealings, programs or services of the organisation,
- b) the person is a volunteer of the Association
- c) a Committee member or the ex-officio member of the Management Committee has a role on the governing body of another organisation, where the activities of that other body may be in direct conflict or competition with the activities of Southlakes U3A.

DEFINITIONS

'*Conflict of interest*' is defined as applying in accordance with the statute, where a Committee member stands to gain financially from any business dealings, programs or services of the Association, other than where the Committee member falls into the class of people benefited by the Association and the financial gain is of a nature common to other beneficiaries.

'*Close relationship*' is defined as any relationship that might reasonably give rise to an apprehension that the Committee member might place the interests of the other party above the interests of the organisation.

RELATED DOCUMENTS

- Conflict of Interest Checklist

AUTHORISATION

Date of Approval by Management Committee	6 May 2019
Signature of U3A Secretary	
Name of U3A Secretary	Pauline Kelly
Signature of U3A President	
Name of U3A President	Susan Coggan
Date:	



APPENDIX A - CONFLICT OF INTEREST CHECKLIST

This checklist is to be used by the President of Southlakes U3A Management Committee at each meeting to record conflicts of interest identified by Committee members.

The completed checklists should be stored with the Minutes of each meeting.

After the opening of the meeting, ask all the members to declare any potential ‘Conflict of Interest’ arising out of any of the issues to be put to the meeting

Meeting Date / / 2019

Name of Member
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Issue of Conflict
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(**Note:** the Disclosure of the Conflict of Interest and the decision of the Management Committee on how to deal with this conflict)

Record of Response

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(Ensure the Minutes record the Declaration of Interest/s declared at this meeting)

Dated the Day of 2019

Signed.....

Position