

## Conflict of Interest Policy

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### 1. Introduction

1.1 The purpose of this Conflict-of-Interest Policy is to protect the interests of Step into Learning by ensuring that all trustees and employees act with integrity and avoid situations where personal interests may conflict with those of the organisation. This policy aims to establish guidelines for identifying, disclosing, and managing conflicts of interest.

### 2. Scope

2.1 This policy applies to all employees, trustees, and self-employed people within Step into Learning. Anti-bribery measures are included within the scope of this policy.

### 3. Definitions

3.1 Conflict of Interest: A situation in which a trustee's or employee's personal interests or affiliations conflict with their duty to act in the best interests of Step into Learning.

3.2 Related Party: Any person or entity that has a familial, financial, or personal relationship with a trustee or employee that may influence their decisions or actions within the organisation. Any Individuals or entities closely associated with the contracted DfE/ESFA funding, including employees, affiliates, partners, or subcontractors.

## 4. Policy Statement

4.1 All trustees and employees have an obligation to promptly disclose any actual, potential or perceived conflicts of interest to the Board of Directors or Executive Director. This disclosure should include:

- Any financial interest or relationship that could reasonably be expected to impair the individual's objectivity in performing their duties.
- Any employment, consultancy, or board membership with an entity that competes with or has a relationship with Step into Learning.
- Any gifts, favours, or benefits received from a party that does business with or seeks to do business with Step into Learning.

4.2 Contractors must promptly identify and disclose any actual or potential conflicts of interest that may arise from their own interests or those of related parties in relation to the funding they are responsible for delivering.

### **Review and Management**

4.3 Upon receipt of a disclosure, the Board of Trustee or Executive Director will review the conflict and determine the appropriate course of action, which may include:

- Requesting additional information or clarification from the individual.
- Assessing the significance of the conflict and its potential impact on the organisation.
- Implementing safeguards or mitigation measures to minimise the risk of undue influence or bias.
- Recusal of the conflicted individual from related decision-making processes or transactions.
- In cases of significant conflicts, an independent party may be engaged to oversee the funding delivery process and ensure impartiality.

### **Confidentiality**

4.3 All disclosures of conflicts of interest and related deliberations will be handled with discretion and confidentiality, except as required by law or regulation.

### **Annual Disclosure**

4.4 Trustees and employees and third-party providers/ sub-contractors are required to provide an annual affirmation of compliance with the Conflict of Interest Policy, including disclosure of any new or ongoing conflicts of interest.

**Compliance**

4.5 Failure to comply with this Conflict of Interest Policy may result in disciplinary action, up to and including termination of employment or removal from the Board of Directors.

## Appendix 1 –Step into Learning Trustee

### Declaration of Interests Form

As a Trustee of Step into Learning, you are required under the Trustee Code of Conduct to register specific financial and other interests and the receipt of individual gifts and hospitality in the Register of Trustees' Interests. Failure to make a complete and accurate disclosure may be considered a breach of the Code actionable under the Charity's Standing Orders.

A conflict of interest may not preclude you from completing your trustee role but Step into Learning will ensure monitoring measures are put into place to mitigate any risks.

Please complete the form below and continue items on a separate sheet, if necessary. If you are unsure as to whether something should be declared or not, please contact the Executive Director or Chair for clarification.

Name:	
Category	<i>Please give details of the interest and whether it applies to yourself, or where appropriate, a member of your immediate family, connected persons or some other close personal connection, and the name of the person and their relationship to you, if the interest does not relate to yourself.</i>
Current employment and any previous employment in which you continue to have a financial interest.	
Any business or consultancy interests (actual or planned).	

Appointments (voluntary or otherwise), e.g., trusteeships, directorships, local authority membership, tribunals, etc.	
Membership of any professional bodies, special interest groups, or mutual support organisations.	

Investments in unlisted companies, partnerships and other forms of business, significant shareholdings (exceeding the value of £20,000 or five percent of the total issued share capital of that company, whichever is the lower) and beneficial interests.	
Gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last twelve months.	
Do you use, or care for a user of the organisation's services?	
Any personal relationships with the staff of Step into Learning?	
Any personal relationships with or previous knowledge of Step into Learning learners or learners registered at SIL's contracting partners.	
Any contractual relationship with the charity or its subsidiary?	
Any potential conflicts that are not covered above?	

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided on an annual basis and immediately of becoming aware of any change to this information. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed:

Position:

Date: \_\_\_\_\_

## Appendix 2 – Step into Learning Staff

### Declaration of Interests Form

Please complete the form below and continue items on a separate sheet, if necessary. If you are unsure as to whether something should be declared or not, please contact the Executive Director for clarification.

A conflict of interest may not preclude you from completing your trustee role, but Step into Learning will ensure monitoring measures are put into place to mitigate any risks.

Failure to make a complete and accurate disclosure may result in disciplinary action.

Name:	
Category	<i>Please give details of the interest and whether it applies to yourself, or where appropriate, a member of your immediate family, connected persons or some other close personal connection, and the name of the person and their relationship to you if the interest does not relate to yourself.</i>
Current employment and any previous employment in which you continue to have a financial interest.	
Any business or consultancy interests (actual or planned).	
Appointments (voluntary or otherwise), e.g., trusteeships, directorships, local authority membership, tribunals, etc.	

Membership of any professional bodies, special interest groups, or mutual support organisations.	
Investments in unlisted companies, partnerships and other forms of business, significant shareholdings (exceeding the value of £20,000 or five percent of the total issued share capital of that company, whichever is the lower) and beneficial interests.	
Gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last twelve months.	
Any personal relationships with the board of trustees or other staff	
Any personal relationships with or previous knowledge of Step into Learning learners or learners registered at SiL's contracting partners.	
Any assessment conflicts of interest, for example, completing Step into Learning courses or assessing SiL staff on SiL	
Any contractual relationship with the charity or its subsidiary.	
Any potential conflicts that are not covered above.	





To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided on an annual basis and immediately of becoming aware of any change to this information. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

*NB: The categories in this form are based on guidance note on the Charity Commission website.*

## Appendix 3 – Step into Learning Self Employed Declaration of Interests Form

Please complete the form below and continue items on a separate sheet, if necessary. If you are unsure as to whether something should be declared or not, please contact the Executive Director for clarification.

Name:	
Category	<i>Please give details of the interest and whether it applies to yourself, or where appropriate, a member of your immediate family, connected persons or some other close personal connection, and the name of the person and their relationship to you if the interest does not relate to yourself.</i>
Current employment and any previous employment in which you continue to have a financial interest.	
Any business or consultancy interests (actual or planned).	
Appointments (voluntary or otherwise), e.g., trusteeships, directorships, local authority membership, tribunals, etc.	





To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided on an annual basis and immediately of becoming aware of any change to this information. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed:

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Position:

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Date:

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Owned by:	Last reviewed:	Due for review:
Board of Trustees	21/01/2024	21/01/2025