

#### 4.14 Conflict of Interest Policy

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##### 1. INTRODUCTION

- 1.1. This policy covers Virtus staff, volunteers, committee members, board members and anyone who holds a formal role with the organisation whether paid or voluntary, permanent or temporary.
- 1.2. Officers may on occasions experience conflicts of interest between their role with Virtus and outside activities and interests
- 1.3. Officers are expected to declare potential conflicts of interest. This is important to ensure that you are not open to allegations of abusing your position in Virtus
- 1.4. Virtus does not wish to interfere in the personal lives of its officers
- 1.5. Any measures taken as a result of a declaration will seek to balance Virtus's business interests and the people we support, with the rights of officers
- 1.6. Failure to declare a potential conflict of interest may result in disciplinary action

##### 2. WHY IS IT IMPORTANT?

- 2.1. Virtus recognises that personal relationships and commitments outside of work may sometimes have an impact at work or could appear to others to have an impact on your work. This policy set out some of the areas where potential conflicts may occur and outlines the steps officers and managers should take in these circumstances.

##### 3. VIRTUS' RESPONSIBILITY

- 3.1. Virtus is responsible for ensuring that the services it provides are of the highest standard. It is also responsible for ensuring that officers do not abuse their Virtus position for personal gain or to benefit their family and friends.

##### 4. OFFICER RESPONSIBILITY

- 4.1. Virtus expects officers to be impartial and honest in their work and professional conduct. Virtus officers have a personal responsibility for their conduct and are expected to anticipate and declare any potential conflicts of interest in a timely manner. If you are not sure if there is a conflict, it is always best to declare it.

##### 5. BUSINESS INTERESTS

- 5.1. There may be circumstances where you have an association with one of Virtus's suppliers or contractors or where you are involved with an organisation linked to Virtus that could cause a conflict of interest or be seen by others as causing a conflict of interest. This may be because the association casts doubt on your impartiality or causes suspicion that you could be using your position with Virtus for personal gain. Where there is a potential conflict you should declare it as early as possible.
- 5.2. The following are examples of the types of roles with other businesses that have the potential to create a conflict of interest if the organisation has any business connections with Virtus, or operates for a similar purpose to Virtus or may be in direct competition to Virtus. The examples are given as guidance only and are not exhaustive, but include being:

- a. a director, or shareholder of a company

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- b. a trustee of a charity
- c. a local authority councilor
- d. involved in the management of an organisation in the same type of business (another disability sport charity) or with a competitor organisation
- e. secondary employment outside of Virtus
- f. being employed directly by someone who you are responsible for providing support to in your role with Virtus
- g. involvement in a Virtus member organisation
- h. involvement in any company supplying goods or services to Virtus
- i. in a personal relationship with another officer

5.3. Virtus may decide it is unacceptable for officers occupying certain posts for example where decisions in awarding contracts or money may need to be taken, to have private business interests where these may potentially conflict with the interests of Virtus.

#### 6. RECRUITMENT

6.1. In order to avoid any possible accusation of bias, you must not be involved in the appointment or recruitment exercise where you have a close personal relationship - as indicated in the examples shown above - with either an internal or external applicant.

6.2. Once you/an applicant has disclosed a business interest or close personal relationship, this information will be treated in confidence. Virtus will make a confidential file note that will be retained on file. The note will record details of the declaration, the actions agreed between you and Virtus and where appropriate a review date.

#### 7. EMPLOYMENT OUTSIDE OF VIRTUS/SECONDARY POSITIONS

7.1. Virtus does not wish to prevent you from taking on additional employment or roles in your private time.

7.2. However, if, in Virtus's opinion the secondary position has the potential to create a conflict of interest, Virtus reserves the right to withdraw support.

#### 8. PUBLICATIONS AND PUBLIC SPEAKING

8.1. If you are contributing to external publications or speaking on Virtus's behalf as part of your responsibilities with Virtus, you should follow the normal procedures such as informing the Secretariat and following the communications' protocols.

8.2. If you are offered payment, you should declare this to Virtus. Normally you should not accept a fee but you may accept expenses. If you are carrying out these activities in your own time or with your own resources and have been offered payment, you should also declare this to Virtus so that any perceived conflict of interest is considered.

8.3. If you speak or write on matters which do not have a direct bearing to your role with Virtus but where the comments may be attributed to Virtus you should seek the permission of Virtus first.

8.4. Any material produced that is related to work remains the intellectual property of Virtus. This means that Virtus is the legal owner of the material.