

Conflicts of interest and Gifts & Hospitality Policy

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1. Purpose

Fair Game UK is committed to ensuring the highest standards of conduct in all that it does. We know that conflicts of interest and the offer of gifts and hospitality can occur in the course of our work, and it is important to know what to do if or when this happens. This policy is designed to help our people understand conflicts of interest, gifts, and hospitalities: where they might occur, how they can be avoided and how to manage them when they are identified.

Conflicts of Interest can be registered here: <https://forms.gle/RHmxEAt3hV82X3fx8>

2. Introduction

2.1 Conflicts of interest, gifts and hospitality are areas where our peoples integrity or personal judgement can be or perceived to be compromised. This perception can and will have an adverse effect of Fair Game UK's reputation and the objectives we aim to achieve.

2.2 Integrity and professionalism should be maintained when undertaking work for Fair Game UK, acting in our interest at all times. Private interests, whether these are of a personal, financial, or political nature, must not impact adversely upon peoples' ability to undertake official duties responsibly. Our people must not put themselves in a position where their actions can reasonably be perceived to be open to improper influence.

2.3 To alleviate this risk all our people must ensure that they make a declaration at the earliest opportunity once they have:

- become aware that a conflict of interest may exist; or
- been offered a gift or hospitality (accepted or declined).

2.4 As soon as a declaration has been made, supervisors must:

- ensure that they review all declarations within five working days and agree any mitigating actions if required;
- monitor the frequency of declarations made by our people who have accepted gifts and hospitality.

3. Policy statement

Aims

3.1 All our people must:

- Seek to avoid situations in which they have a direct or indirect interest which conflicts with the interests of Fair Game UK;
- Ensure that their private or personal interests do not influence their decisions, and that they do not use their position to obtain personal gain.

3.2 In circumstances where a conflict of interest cannot be avoided this must be declared and managed appropriately.

Definitions

Conflict of Interest: any situation in which a volunteer has a private or personal interest which may or could be perceived to compromise their ability to do their job. Actual, potential (could develop) or perceived (could be considered likely) conflicts of Interest can arise across all areas of our work. Conflicts may be of a personal, financial, or political nature.

Gifts: something that is bestowed voluntarily and without compensation upon a volunteer, including, but not limited to, goods, money, and gift cards.

Hospitality: the reception and entertainment of guests, visitors, or strangers including, but not limited to travel, accommodation, and refreshments.

Scope

3.2 This policy applies to:

- All our people (volunteers, Directors, members of the Advisory Council, and all colleagues working on our behalf)

4. Our Standards

4.1 Conflicts of interest

Types of conflict of interest

4.1.1 Personal Interests

- Fair Game UK recognises that our people will develop relationships, friendships, and contacts in their personal and working lives that may influence their objectivity. The majority of these relationships will not give rise to any concern and can be regarded as a private matter.
- However, a conflict of interest arises where one party in the relationship can grant the other an unfair advantage or disadvantage or can exert improper influence over a decision relating to the other. This might attract perceptions of bias and unfair treatment were, for example, people:
 - make or significantly influence any decisions about the other party in the relationship, such as selection for employment/projects, performance management, discipline, access to opportunities and resources or the awarding of contracts for goods and services;
 - have responsibility for the direct or indirect supervision of the other party.

4.1.2 Financial Interests

- A financial conflict of interest may arise where it could be perceived that a person working us (or someone they have a personal relationship with) has:
 - the opportunity to gain financially, prevented someone from gaining financially or placing that individual at a disadvantage from the person's decisions or actions;
 - financial interests which may influence the person's independent judgement and integrity in carrying out their role;
 - the opportunity to gain from the award of a particular contract for goods or services; or
 - been declared bankrupt and their financial status makes them more vulnerable to situations which could be seen to compromise their official position.

4.1.3 Political Interests

- Our people may have strongly held political views but under no circumstances must these be reflected in any decision-making process or alter aspects of their work. When representing Fair Game UK, people must not express party political viewpoints.

Declaration of interests

4.1.4 Our people must disclose and discuss any potential conflict of interest with their supervisor at the earliest opportunity. The Board will keep a central record of interests for all office holders (the central register of interests). Information supplied on the declaration of interests for the office holders must be reviewed at least annually and updated as and when relevant interests change during the year. A member of the Board will be nominated to be responsible for this.

4.1.5 Directors and members of the Advisory Council should declare any positions they hold or membership, whether paid or unpaid, with any organisation(s) that may lead to a conflict of interest. They must declare also any relationships with any person who has direct influence over their engagement with Fair Game UK. We will consider the implications of any such declaration and take whatever action is required to ensure that the conflict of interest will not unduly influence decisions, responsibilities, or normal working behaviour.

4.1.6 The Conflict of Interest and Gifts & Hospitality procedure provides instructions on how and when to declare an interest, as well as to determine whether there is a conflict of interest or not.

4.2 Gifts and Hospitality

It is widely recognised that it is important for Fair Game UK people to maintain and build effective networks in order to support the work of the organisation, and to gain a real understanding of the views of stakeholders. However, contact with organisations can give rise to offers of gifts and hospitality. While accepting gifts and hospitality in certain circumstances may further the organisation's interests this must be balanced with upholding high standards of propriety and guarding against any reasonable suspicion of perceived or actual conflicts of interest, or an undue obligation being created.

4.2.1 Acceptance

- Gifts and hospitality should not normally be accepted, but Fair Game UK recognises that in some cases non acceptance may cause embarrassment to the provider. All offers of gifts and hospitality which might be perceived to compromise your personal judgment or integrity should be declined.
- Employees must be aware that offers of this kind may place them in a difficult position, because to refuse may cause misunderstanding or offence, particularly if the offer comes from an overseas Government or Government organisation. On the other hand, to accept could involve criminal liability or give rise to questions of impropriety.
- All our people must declare and record all gifts & hospitality (accepted or declined) that are valued over £25.
- If there is any doubt on whether or not hospitality or gifts should be accepted, you should seek advice and guidance from your supervisor or the CEO.
- Hospitality and gifts should never exceed £250, above this hospitality should be declined.

4.2.2 Gifts

- Gifts should not normally be accepted. The only exceptions are those which would normally be considered as isolated trivial gifts e.g. low value items that can be used or displayed in the workplace such as office stationery or mouse mats or inexpensive seasonal gifts such as diaries and calendars.

- Gifts which cannot be refused without causing offence for example a picture or an ornament must be accepted “on behalf of the organisation”, making it clear that it is not being accepted as a personal gift.

4.2.3 Hospitality

- Any hospitality accepted should be in the interests of the organisation and help further its objectives. It should not be over-frequent or over-generous. Accepting hospitality from the same organisation could lead to a perception that the work of the department is being influenced by the objectives of a single organisation. Any hospitality accepted should not seem lavish or disproportionate to the nature of the relationship you have with the provider.
- Our people should not accept lavish hospitality or any hospitality which could be interpreted as a means of influencing the manner in which they carry out their duties, nor should they offer such hospitality.
- If gifts, legacies, or hospitality are offered by service users – rather than clients or partners – careful consideration must also be given to safeguarding issues.

4.2.4 Declaring gifts and hospitality

- Everyone should declare:
 - Gifts in **excess of £25**, as provided in 4.2.1.
 - Gifts and/or hospitalities of **any value** that, depending on the circumstances, might be seen as to compromise personal or professional integrity or the organisation’s reputation. The value of the gift to the giver should be considered, as should the nature of the relationship to the giver.
 - Gifts and/or hospitalities of **any value**, in case of doubt about the need to declare.
- Our people should inform their supervisor or the CEO of offers of gifts or benefits, if possible, in advance of accepting them,
- Directors and members of the Advisory Council must declare offers of gifts or hospitality using the Gifts and Hospitality online form at <https://forms.gle/RHmxEAt3hV82X3fx8> and if possible, confirm in advance with the Chair if they should be accepted.

5. Monitoring and compliance

5.1 A Director from the Board will be nominated and responsible for maintaining the central register of interests for office holders, and for ensuring its accuracy.

5.2 Each volunteer supervisor is responsible for managing any conflicts of interest that arise in their teams consistent with this policy and accompanying procedure.

5.3 The Board is responsible for the implementation of this policy and for ensuring the effectiveness of the declaration tools for all our people.

6. Review and maintenance

The Conflicts of interest and Gifts & Hospitality Policy was refreshed and approved in September 2022. It is next due to be reviewed in September 2024.