

## **LETTA**

# Conflict of Interest policy

Approved &	Spring 2025	To be reviewed:	Spring 2027
adopted on:			3,200

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#### 1. Introduction

Staff at LETTA are likely to have a range of interests. These could be defined simply as a stake and/or direct or indirect involvement in an undertaking, and may or may not be financial.

A conflict of interest can occur when one's duties to the organisation compete with one's personal interests or duties to other people or organisations. Actual or perceived conflicts can arise from external activities, personal relationships, or conflicting roles within the wider LETTA partnership. They can be financial, non-financial or both.

All staff at LETTA will strive to avoid any conflict of interest between the organisation and the individual's work and personal, professional, and business interests which could adversely affect their judgement or objectivity. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest, which could compromise or appear to compromise their decisions.

#### 2. Purpose

The purpose of this policy is to protect the integrity of LETTA's decision-making process, to enable our stakeholders and partners to have confidence in our integrity, and to protect the integrity and reputation of staff.

#### 3. Scope

This Policy applies to all LETTA staff members, external members of committees and contractors, consultants or practitioners working in or for LETTA.

It is the responsibility of each individual to recognise situations in which they have a conflict of interest, or might reasonably be seen by others to have a conflict, to disclose that conflict to the appropriate person and to take such further steps as may be appropriate as set out in more detail under the procedures set out below.

If an individual is uncertain about how this policy might affect their activities or has any questions about its application, they should contact the appropriate person, as set out in the procedures below.

#### 4. Recognising conflict of interest

A conflict of interest arises where the commitments and obligations owed by an individual to the organisation are likely to be compromised, or may appear to be compromised, by:

- i. That person's personal gain, or gain to immediate family (or a person with whom the person has a close personal relationship) whether financial or otherwise.
- ii. The commitments and obligations that person owes to another person or body.
- iii. That person's close connection (familial or otherwise) with an individual or organisation which has competing or vested interests in LETTA.

There can be situations in which the appearance of conflict of interest is present even when no conflict actually exists. Thus, it is important for all LETTA staff members and partners when evaluating a potential conflict of interest to consider how it might be perceived by others. Apparent or perceived conflicts of interest can be as damaging as actual conflicts of interest.

Actual or potential conflicts of interest may be financial or non-financial or both, and may arise from an individual's roles, relationships or activities.

#### 5. Procedures

It is the responsibility of each individual working with LETTA to recognise situations where they have a conflict of interest or, might reasonably be seen by others to have a conflict, to disclose this conflict in order for appropriate steps to be taken. LETTA will raise with relevant individuals, where they identify conflict of interest or perceived conflict of interest and take appropriate action to address this.

LETTA follows the process detailed below for declaring an actual or potential conflict of Interest:

- All staff are issued with a conflict of interest form to complete on commencement with the organisation;
- The form is completed even when the individual has no conflict of interest to declare:
- The information submitted is evaluated by LETTA in order to identify if any
- further action is required;
- Where conflict of interest is identified, this information is transferred to a register of interests' document, which is stored electronically;
- If the individual concerned has any changes to their declared circumstances, they must inform LETTA and complete an updated conflict of interest form.

Generally, no further action than the completion of the conflict of interest form is required. Where further action is required in line with the information disclosed, then the action to be taken is agreed between the individual and LETTA and recorded on the register of interests.

#### Examples of actions that could be taken:

- Individual not taking part in discussions or decisions of certain matters;
- Referring certain matters for decision to others with no vested interest;
- Agreeing not to be involved in a particular project or with a particular centre:
- Declaring an interest when it is appropriate to do so;
- Referring the matter to the appropriate leader and/or stakeholder for advice and guidance.

Appendix A – Declarations of Interest
Complete all sections below and return this form to the administrator.

Name:		
Role with LETTA:		
Membership of Public or Professional Bodies		
Relationship with any known or potential supplier of Goods and Services to LETTA, including financial interests		
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Any other committee and	which might load to a Conflict of Interest	
Any other commitment which might lead to a Conflict of Interest		
Signed:		
Date:		