**[Organisation Name]**

**CONFLICTS OF INTEREST POLICY**

*Definition*

A conflict of interest may arise from a number of situations. For example, there may be direct financial gain to a [trustee/Committee member] if payments are made to them for professional services provided, such as legal or accountancy services.

A conflict might also arise where [trustees/Committee members] benefit directly from [the ORGANISATION’S] services.

A situation could also arise where a [trustee/Committee member] is an employee or Director of a company which whom [THE ORGANISATION] contracts such as plumbers, electrical companies, printing and stationery suppliers, etc.

Reimbursement of reasonable expenses incurred by [trustees/Committee members] is not deemed to create a conflict of interest.

*Register of interests*

[THE ORGANISATION] maintains a register of interests which should be subject to annual review.

All new [trustees/Committee members] are expected to register any interests and existing [trustee/Committee members] should review their interests at least once a year.

*Authorisation and management of conflicts*

We expect [trustee/Committee members] to be able to identify conflicts of interest when they arise and to ensure, if they receive a material benefit as a result of the conflict of interest, that the benefit is authorised by [THE ORGANISATION]’s governing document.

When a conflict of interest has been identified, [THE ORGANISATION] will seek to establish if the [trustee/Committee member will receive a material benefit and if so whether this has been authorised.

If there is no such authorisation, [THE ORGANISATION] will consider whether it is in [THE ORGANISATION]’s best interests to permit the benefit and resulting conflict of interest.

[THE ORGANISATION] will put procedures in place to ensure that the conflict is properly recorded and managed. Such procedures are likely to include the removal of the [trustee/Committee member] from any decision making process relating to the subject of the interest, and keep records of all relevant discussions and decisions.

*[Compliance with statutory laws and regulations*

If the organisation is subject to any regulatory body, such as Charity Commission regulations, Companies Acts and other statutory requirements which are different from or extend this policy, the statutory position will take precedence. The register of interests is subject to the GDPR and Data Protection Act 2018 and any subsequent Acts or amendments.]

Further guidance on conflicts of interest is obtainable from the Charity Commission [www.gov.uk/government/publications/conflicts-of-interest-a-guide-for-charity-[trustee/Committee members-cc29](http://www.gov.uk/government/publications/conflicts-of-interest-a-guide-for-charity-trustees-cc29)

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# [ORGANISATION NAME] Equalities & Diversity Policy

#### 1 Principles

[ORGANISATION] wholeheartedly supports the principles of equality and diversity in employment and service delivery.

We aim to encourage, value and manage diversity and we recognise that talent and potential are distributed across the population. Not only are there moral and social reasons for promoting equality of opportunity, it is in the best interest of this organisation to recruit and develop the best people for our jobs from as wide and diverse a pool of talent as possible.

[ORGANISATION] recognises that many people in our society experience discrimination. Discrimination is acting unfairly against a group or individual through for example exclusion, verbal comment, denigration, harassment, victimisation, a failure to appreciate needs or the assumption of such needs without consultation.

All forms of discrimination are unacceptable, regardless of whether there was any intention to discriminate or not. Employees, Board trustees and volunteers have a duty to co-operate with [ORGANISATION] to ensure that this policy is effective in ensuring equal opportunities and in preventing discrimination.

#### 2 Statement of Intent

[Organisation] believes that it should promote equality of opportunity and diversity, and actively fight against discrimination in all areas of its work and employment and management practices. This includes in the areas of:

* Service delivery
* Recruitment
* Policies and procedures
* Management practices
* Accessibility
* Monitoring and evaluation

[ORGANISATION] is aware that in order to deliver its strategic objectives effectively, it has to reflect the communities it serves. The application of equality in the workplace is essential for effective service delivery as well as being good management practice (see [ORGANISATION] Recruitment Policy).

It is intended that [ORGANISATION] employees/volunteers should be enabled to develop their full potential, and that the qualities of the workforce are fully applied to realising the objectives of the organisation.

[ORGANISATION] aims to create a culture that respects and values each other’s differences, that promotes dignity, equality and diversity, and that encourages individuals to develop and maximise their true potential.

We aim to remove any barriers, bias or discrimination that prevent individuals or groups from realising their potential and contributing fully to our organisation’s performance and to develop an organisational culture that positively values diversity.

We are committed wherever practicable, to achieving and maintaining a workforce that broadly reflects the local community in which we operate.

We would like our workforce is be truly representative of all sections of society. Selection for employment or promotion or any other benefit will be on the basis of merit and ability only. Selection for training will be on the basis of job requirement only. Intimidation, harassment and bullying will not be tolerated and may lead to disciplinary action.

[ORGANISATION] accepts its responsibilities as set out in the following legislation. [ORGANISATION]’s responsibilities are not limited to those items listed, but are defined by any current relevant legislation, or best practice.

**2.1 Equality Act 2010**

**Employment provisions (See Appendix 1 for definitions)**

# 2.2 Human Rights Act 1998

[ORGANISATION] understands that The Human Rights Act allows cases concerning the rights under the European Convention on Human Rights (1950) to be brought in the UK courts.

It also ensures that domestic legislation is interpreted in a way that is compatible with the Convention rights. It applies to all public authorities, making it unlawful for such bodies to violate Convention rights and placing a duty on public authorities to ensure that respect for human rights is integral to their work. [ORGANISATION] adopts a human rights based approach to its work and performs its functions in accordance with the legislation.

[ORGANISATION] accepts the findings of the Stephen Lawrence enquiry with particular reference to the concept and definition of ‘institutional racism’ (see Appendix 1: Legal definitions).

**3 [ORGANISATION]’s equal opportunities aims are to:**

* Provide services that meet the needs of all communities in London
* Promote equal opportunities and tackle discrimination
* Be a fair employer
* Meet its legal obligations under relevant legislation

People with protected characteristics are particularly at risk of discrimination. The protected characteristics are

* Age
* Disability
* Gender reassignment
* Pregnancy and maternity
* Marriage and civil partnership
* Race
* Religion and belief
* Sex
* Sexual orientation

In addition [ORGANISATION] believes that there are others such as:

* Gypsies and travellers, asylum seekers and refugees who often also get marginalised
* Ex-offenders, who are often disadvantaged in the housing and labour markets

We recognise that some individuals experience issues of multiple -discrimination.

[ORGANISATION] will aim to ensure that equality and diversity concerns are central to service provision and will aim to include equal opportunities objectives in all our strategic and service plans.

In order to do this [ORGANISATION] aims to ensure that equal opportunities become part of mainstream service delivery. Every service in [ORGANISATION] will include a set of specific actions in their work-plans against which progress can be measured.

#### 4 Implementation

**4.1 Responsibility**

The Management Committee/Trustees are responsible for setting [ORGANISATION]’s policy and reviewing, monitoring and developing it. Monitoring and review will take place annually.

**[Name of responsible person]** is responsible for the policy’s day-to-day implementation. Consultation takes place with the staff on the implementation and development of this policy.

**Each employee, volunteer, consultant or [Committee members/Trustee]** is responsible for their own compliance with this policy. Breaches of the Equalities Policy will be regarded as potential misconduct and could lead to disciplinary action against employees, appropriate action against a Committee Member/Trustee or a volunteer, including termination of contracts for services of consultants, or withdrawal of volunteer agreements.

# 4.2 Implementation – Organisation issues and [Employment/Volunteering]

[ORGANISATION] will implement its Equalities Policy in organisational and employment issues by:

# Recruitment

Barriers to employment have a major impact on disadvantaged and minority groups. How [ORGANISATION] will seek to address barriers to employment is defined in [ORGANISATION]’s ‘Recruitment Policy’. [ORGANISATION] will ensure staff members involved in recruitment and selection follow the correct procedures relating to equality and diversity, providing training to do so if necessary.

**Induction**

[ORGANISATION] have a detailed induction policy and checklist that specifically deals with equalities issues in the workplace and work plan.

**Training and Development**

[ORGANISATION] will ensure that all employees have been trained in the practical implementation of this policy, and are aware of their responsibilities.

**HR policies**

[ORGANISATION] has a set of HR polices and will review its employment/HR policies every two years (or earlier if changes in law or best practice dictate). [ORGANISATION] will consult with staff and union or staff representatives on the implementation of this policy, and as part of a continuous review process.

# Bullying and harassment in the work context

Discrimination can take the form of bullying and harassment. Harassment can be defined as:

“Any conduct, physical, verbal or written, that has the intent or effect of unreasonably interfering with an individual’s work performance, or that creates an intimidating, hostile or offensive working environment.”

**4.3 Implementation – Service Delivery**

[ORGANISATION] believes:

* in working towards a just and participatory society;
* that all people have equal rights to work towards social justice and to participate in decision-making processes and local action;
* that all [ORGANISATION] services users have to be treated fairly and equally
* that steps should be taken to promote equal opportunity in relation to access to the services we provide.

[ORGANISATION] will:

* Identify [ORGANISATION] users and predominant users groups’ needs
* Devise policies and procedures outlining how the needs of all users will be met
* Make sure that equal opportunities and inclusion become part of mainstream service delivery through commitments in strategic and service delivery plans
* Make our service accessible to all
* Make sure that equal opportunities and inclusion become part of mainstream service delivery through commitments in strategic and service delivery plans
* Ensure each individual knows their role in this implementation plan
* Inform users and third parties of what steps have been taken to implement [ORGANISATION] policies and procedures to make our services accessible.
* Ensure each individual knows their role in this implementation plan

We will also:

* Require that third parties (such as other legal services providers, contractors, organisations that we may collaborate with on occasion to advance our legal remit) and when undertaking general procurement, comply with equalities standards at least as robust as those that [ORGANISATION] holds for itself
* Aim to increase involvement and collaboration with other organisations to promote diversity and equal opportunities generally
* Challenge practices, legislation and institutions which seek to discriminate against, or deny the rights of, individuals or groups
* Monitor the service provision of [ORGANISATION] against equality criteria (including access/usage statistics by protected category)
* Review the effectiveness of our service delivery and practice based on monitoring and evaluation
* Incorporate relevant guidance from our funders with a view to exemplifying best practice

**4.4 Raising a concern or issue**

Employees or volunteers who feel they have been discriminated against should raise the matter with their line manager. Initially the employee and manager should aim to resolve the matter informally. It may be that discriminatory action is unwitting and easily resolved once the problem is clear.

If the employee is dissatisfied with the outcome, the complaint is very serious, or their line manager is the cause of the complaint, the employee should raise the matter, in writing, as a formal grievance under [ORGANISATION]’s Grievance Procedure. Employees may also use [ORGANISATION]’s Dignity at Work policy if they feel that they are being bullied or harassed at work.

**4.5 Induction and Training**

[ORGANISATION] will ensure that all new employees, volunteers, and Board members will receive induction on the policy and action plan and that consultants, trainers and facilitators will be fully informed.

Appropriate training and guidance will be provided to develop equality and diversity. Adequate resources will be made available to fulfil the aims of this policy.

**[ORGANISATION]’s overall equalities objectives are to**

* **Ensure** that all employees, volunteers and [Committee members/trustees] are aware and trained in the operation of this policy and their requirements under it.
* Work towards our organisational **commitment** to secure equality of opportunity in the [ORGANISATION] workplace and in terms of access to our core services by reflecting this ethos in all [ORGANISATION] policies, publications, employment and working practices
* Continue to identify and **reach** out to individuals and groups who for whatever reason are deemed marginalised and may be in need of our assistance via our community engagement activities
* **Monitor** service use to anticipate trends and future client needs
* Help **empower** individuals to access their legal rights and promote sustainable community cohesion

# 6 Monitoring, evaluation and assessment

The effectiveness of the Equalities Policy is monitored through the collection of statistical data about service users. (See Appendix 3 for [ORGANISATION]’s equalities monitoring form). [ORGANISATION] also monitors its recruitment procedure to determine if there are any groups not applying for posts at [ORGANISATION]. In addition, [ORGANISATION] will regularly monitor the composition of its workforce and its governing body.

Monitoring of staff diversity will be conducted every year. Monitoring data for recruitment will be collected as recruitment occurs.

**6.1 Evaluation of the Action Plan**

The action plan objectives are reviewed by the [Management Committee/Trustees] every year. The Equality policy is reviewed on change of relevant legislation and at each new Strategic plan time period.