

The Research & Evaluation Centre Conflict of Interest Policy

The Research & Evaluation Centre
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Company Limited by Shares Incorporated in England and Wales

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1. Introduction

The REC's conflict of Interest Policy refers to any case where an employee's personal interest might contradict the interest of The REC. This is an unwanted circumstance as it may have heavy implications on the employee's judgement and commitment to The REC, and by extension to the realisation of our goals.

2. Policy & Scope

This policy outlines the rules and regulations regarding the REC's conflict of interest policy and the responsibilities of employees and the company in resolving any such discrepancies. It emphasizes mutual trust, outlines the rules regarding conflict of interest, the responsibilities of employees and company in resolving any such discrepancies, thus ensuring The REC's goals are not compromised.

This company's conflict of interest policy applies to all prospective or current employees of the company, as well as independent contractors and persons acting on behalf of the company.

3. Policy Statement

The REC'S employees bring skills and experience to work gained through their active involvement in the society we live in and this is immensely valuable to The REC and the work we do. However, as a company that works on behalf of bilateral and multilateral development assistance agencies, we rely on our employees to conduct themselves appropriately and to declare any activities in their private lives and any personal or familial relationships that may present a conflict of interest with The REC's work or bring The REC's name into disrepute. Any breach of this policy will be addressed and could result in disciplinary action.

This policy does not form part of an employees' terms and conditions of employment and may be subject to change at the discretion of management.

4. Procedure

4.1 New Employees

- New employees will be required to complete a declaration of conflict of interest in their contract of employment.
- If a potential conflict of interest is declared, HR will discuss the potential conflict with the new employee. A risk assessment form must be completed and a copy will be placed in the employee's personal file by HR.
- If measures cannot be put in place to avoid the conflict of interest, a decision may be made by HR with advice from an independent legal advisor to withdraw the offer of employment on the basis that it represents a significant risk to The REC. Evidence would need to be provided.

4.2 All Employees

- Employees will be required to complete a Declaration of Conflict of Interest form on an annual basis.
- Outside the annual process, employees must notify HR as soon as they know of a possible conflict of interest (this might be if their job or personal circumstances change).
- If HR believes a conflict of interest is evident, they should talk to the employee to see if there is a way it can be resolved. Measures may need to be put in place to manage the conflict of interest.
- HR needs to complete a risk assessment form. The form must be held in the employee's personal file. If the matter cannot be resolved or measures put in place are not working, the formal procedure in Dealing with Problems at Work Policy should be followed.

5. Principles

All REC employees are required to act in the best interests of The REC. By agreeing to work for The REC, you accept a duty to act in REC's best interest.

REC employees must not (whether in your own name, anonymously or under a pseudonym):

- Allow your activities outside work to interfere with your work within The REC
- Allow any conflict of interest between your duty to act in the best interest of The REC and your private interests (including those of a third party).
- Exploit The REC's name, or make use of or exploit your connection with The REC or information obtained during your duties to further your own private interest or those of any outside organisation to the detriment of The REC.
- Act in a manner likely to bring The REC into disrepute or affect its reputation for objectivity, integrity and accountability.

This does not mean that every outside activity is a potential conflict of interest. There will be many activities that have no bearing on your work at The REC and there may be other activities where, provided they are declared in advance, a conflict of interest can be avoided.

Involvement could be as a Company Director or Owner/Partner, working for an organisation, promoting an organisation or having a financial interest in an organisation, including making or receiving loans. It could also be involvement with an individual who has a business relationship with The REC. It does not matter whether the arrangement is paid or unpaid.

5. Type Connections that can give rise to Conflict of Interest

- Associations with organisations or individuals who have a trading relationship with The REC as a supplier or customer.
- Associations with organisations tendering for work from The REC. You need to avoid a situation where your knowledge or involvement in the tendering process could be viewed as influencing a commercial decision in favour of an organisation with which you have a link; including partner organisations.
- Associations with organisations that supply goods and services to The REC. This becomes a matter of concern if you are involved in decisions that might affect the choice of a supplier, the price paid for goods or services or arrangement for the provision of goods and services.
- Active political involvement in a political party or organisation (see below).
- Employing family members, or people with whom you have a close personal relationship, can create a conflict of interest (see below).

Please talk to HR if you are in doubt about an outside activity in which you are already involved when you join the REC. This particularly applies to people joining The REC on a fixed-term, part-time or consultancy basis with existing outside business commitments. You should seek the permission of HR if you intend to use material or information associated with your work or make specific reference to The REC.

Failing to declare a conflict of interest may expose an employee to allegations of bribery, nepotism (see The REC's Anti-Fraud & Corruption Policy) or other disciplinary, civil or criminal offences

6. Personal & Familial Relationships

Employing people who are related in a direct management line can create a conflict of interest. Recognised partners, people closely related to, or in a personal relationship with, a REC employee cannot be employed into a position where they would be in a direct management line. The same applies to the engagement of consultants. Advice should be sought from HR and alternative line management arrangements made.

Where existing employees are subsequently in a personal relationship or become related, they should discuss their employment position with HR. The purpose of this review is to ensure that matters of management, supervision, audit and possible role conflict can be considered, as well as any possible benefits to The REC. The objective is to be reasonable, to safeguard The REC and to maintain good employee relations.

If, during their employment, an employee is considering employment, a voluntary role or a consultancy contract for a close personal relative or friend, the relationship must be declared in writing and any decision referred to HR. If the employee has concerns about a relationship and are not sure if it comes within the scope of this procedure, they are advised to discuss this matter, in confidence, with HR.

In circumstances, where your family or close personal contacts work for organisations or partners with which The REC conducts business, it is important that such relationships are known in advance and you are not placed in a difficult position. Business dealings on The REC's behalf with someone in another organisation whom you know well on a family or personal basis, could affect The REC's reputation. In these circumstances employees should discuss the relationship with HR.

7. Internet Web Sites

If you are developing an Internet web site for yourself or an outside organisation, you must not use The REC's copyright material or information (whether confidential or otherwise) and must not link to any REC website or online documentation without the prior written permission of your manager.

8. Purchasing

Anyone involved in purchasing, tendering or commissioning must not have an undeclared association with any outside organisation involved in the process. Where an association does exist, you will not be permitted to become involved in the commercial processes. Unless HR has given you specific permission, you must not provide information or assistance to any organisation or individual tendering for work from The REC. Everyone tendering for work needs to feel that they have received fair and equal treatment.

9. Private Purchases and Gifts

You and your immediate family must not accept gifts from organisations or individuals with whom you have or might have dealings on behalf of The REC. This can include goods and services in kind or at preferential rates, cash and entertainment outside the scope of normal business hospitality.

You can accept normal business hospitality on a reasonable scale when representing The REC and its interests. You should not place yourself in a position where the hospitality could be interpreted as a form of inducement and must comply with The REC's Anti-Bribery Policy. If you have any questions or concerns, please speak to HR or the Director.

10. Political Activities

The REC supports the right of employees to be politically engaged and active. However, active involvement in a political party or organisation can give rise to questions of impartiality. What is acceptable is dependent upon the individual's job, their level in the organisation and the extent of their political involvement. You should talk to HR if you:

- Currently hold an elected position in Local Government at any level.
- Intend to re-stand for a position you already hold. Where there is an existing agreement to holding elected office, The REC will normally allow councillors to stand for re-election.
- Seek nomination or are selected as a candidate as the immediate consideration is to safeguard The REC's reputation for impartiality.
- Act as a voluntary advisor to an elected politician.
- Hold an elected office in a political party.
- Wish to stand for election to local Council, parliament or political party.

Standing for election requires consent from The REC which will not be unreasonably withheld. However, we retain the right to consult with you on how to conduct yourself so that The REC's name does not come into disrepute.

If you stand for election as a Member of Parliament, you will be granted unpaid leave of up to six weeks prior to election. If you are elected, you will be required to resign from The REC immediately.

11. UK Political Parties

You should inform HR if you intend to seek nomination as a candidate for:

- UK Parliament
- Scottish Parliament/Welsh Assembly
- Any Northern Ireland-wide politically elected body
- Local Government

In the case of local government elections, you must campaign in your own time and make sure that there is no conflict with your work at The REC. Polling day itself should be taken either as holiday or as unpaid leave. You can be elected to a position within local government and remain in employment if there are no issues of impartiality or conflict of interest. Employees are expected, where possible, to schedule council commitments outside core working hours but may agree a reasonable working schedule with their manager to make up lost hours. Active campaigning during working hours is not acceptable.

If one of your family or a close personal contact is standing for election it is acceptable to express personal support for the individual standing for election, but you should not use The REC's name and where your support extends to political support this will be subject to the considerations outlined above.

12. Trade Union/Staff Association Activities

Employees are free to take part in activities organised by a union/staff association that is recognised by The REC. Please refer to the Employee Relations and Involvement Policy.

Employees who are elected as accredited trade union representatives may, from time to time, comment on political matters whilst representing the interests of their members. When expressing such views, employees should state that they are expressing these views as a trade union representative and that they are not necessarily reflecting the views of The REC.

13. Use of Information and Resources

Anyone working for The REC must not use The REC's resources to further their private interests or do any work for an outside company. You should seek the permission of the Director before using REC's information or making reference to The REC in any book, article, lecture or statement to the press.

You must not reveal or share confidential information, including personal or sensitive data, received in the course of your duties, to a supporter, supplier, competitor or other organisation without authorisation from The REC. This is a commitment to confidentiality gained during employment and continues after you have left The REC. Anyone who deliberately reveals such information maybe in breach of The REC's Data Protection Act obligations and the Code of Conduct in relation to acting appropriately, professionally and with integrity and accountability to the people we work with, will be dealt with in accordance with the Dealing with Problems at Work Policy.

A conflict of interest or information disclosure is different to sharing information when reporting misconduct under whistleblowing. An employee who reports wrongdoing to a 'prescribed person' (normally a legal adviser, their employer, relevant party such as a regulatory body or other) as part of a 'protected disclosure is considered a whistleblower.

If an individual has a concern with reasonable belief that the concern is in the public interest, even if it is later discovered that you are mistaken, under whistleblowing protection the employee will not be at risk of losing their job or from suffering any form of detriment or retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice. Those found to be making false allegations maliciously maybe subject to disciplinary action should any malicious intent be proven.

Survivors whom make a whistleblowing disclosure to a person or body (other than their employer or a prescribed body) will be protected from dismissal or any other detriment if they reasonably believe that the disclosure is in the public interest, substantially true and they act reasonably and responsibly in making that disclosure. It is advised that they have exhausted all other reporting routes open to them first by reporting concerns to The REC.

You are not permitted to take your partner or any other personal contact on a business trip at The REC's expense, unless it is a requirement of the formal duties of the visit and has been approved in advance (in writing) by the appropriate Director. In any other circumstances, if you wish to be accompanied, you must have the authorisation of the Director and all expenses for the companion, including travel and accommodation, must be paid for.

14. Employee concerns

Any employee who has concerns about breaches of the principles outlined in this policy should raise them by emailing: jnamadi@therec.co.uk or by using the webform on: <https://therec.co.uk/misconduct>. Any employee who feels they have been unfairly treated under the terms of this policy may raise a grievance under the Dealing with Problems at Work Policy.

15. Version Control

This policy will be reviewed every 2 years or earlier as required with legislation or external changes. Existing policies that need to be reviewed, must comply with this policy on Organisational Policies.

Version	Summary of Change	Approved by	Approval Date	Revision Date
1	New Policy	Human Resources	01 Oct 2024	01 Oct 2025