

Conflict of Interest, Gifts and Hospitalities Policy

1. Purpose

To set out the British Red Cross' (BRC) position regarding conflicts of interest (including gifts and hospitalities) and rules for identifying and managing these conflicts.

2. Scope

This policy applies to all BRC staff, volunteers, including office holders, consultants, contractors, and third-party organisations contracted to work on behalf of the BRC in the UK and internationally ('our people').

3. Policy Statement

BRC seeks to ensure that personal and financial interests of employees, volunteers, Board members, and anyone acting on behalf of the BRC do not compromise, or appear to compromise, the trust and confidence in the organisation.

Having an actual or possible conflict of interest, which includes offers of gifts or hospitalities, is not necessarily an issue. Actual and potential conflicts can generally be addressed by implementing simple measures and ensuring appropriate disclosure.

To ensure a proper handling of conflicts of interests, we require our people to:
Proactively identify actual or potential conflicts of interest.

- 3.1.** Proactively identify actual or potential conflicts of interest
- 3.2.** Seek to avoid situations in which they have a direct or indirect interest which conflicts with the interests of the BRC, the Movement Red Cross or our Fundamental Principles.
- 3.3.** Disclose interests with their line-manager (in the case of office holders, with the Chief of Staff or the BRC Chair) at the earliest opportunity. If in doubt about whether a conflict exists, disclose all interests to the line manager for guidance.
- 3.4.** Declare any positions held or membership, whether paid or unpaid, with any organisation(s).
- 3.5.** Discuss any identified actual or potential conflict with the line manager, who will ensure this is recorded and managed in accordance with the instructions in the Conflict of Interest, Gifts, and Hospitalities Procedure.
- 3.6.** In relation to gifts and hospitalities:
 - 3.6.1.** Carefully consider declining offers of any gifts or hospitalities or other benefits of any value which could be construed as attempts

to gain preferential treatment or unfair advantage or influence the way duties are carried out.

- 3.6.2.** Only accept offers in excess of £25 if appropriate, in accordance with the previous section, and only when the refusal could cause an offence.
- 3.6.3.** Declare to the line manager any offers of gifts, hospitalities and benefits that are offered by any supplier, contractor or consultants; or that might compromise our integrity or reputation; or exceed the thresholds specified in the Conflict of Interest, Gifts, and Hospitalities Procedure. The line manager will ensure this is recorded as soon as practicable and managed in accordance with the instructions in the Conflict of Interest, Gifts, and Hospitalities Procedure
- 3.7.** Immediately declare the possibility that they might be named as a beneficiary of a legacy directly as a result of carrying out their work.
- 3.8.** For office holders only:
 - 3.8.1.** Abide by the strict limits on benefits imposed by the law that may be conferred on charity trustees, and follow the rules set out in our Royal Charter and Standing Orders (rules of governance), according to the Conflict of Interest, Gifts, and Hospitalities Procedure.
 - 3.8.2.** A trustee may not also serve as a Volunteer Representative or President, in accordance with the Standing Orders.
 - 3.8.3.** An office holder may have a partner who is a paid employee (the 'employee partner'). However, a person may not be appointed as an office holder if they are the partner of a member of ELT.

3.9. Lessons Learned from Policy Evaluation

A review of this Policy was undertaken, and feedback requested from identified users of the Policy and received from Head of Employee Relations, Governance team and Complaints Manager. Additionally, it underwent extensive consultation across BRC. This informed improvements to this document including more inclusive language; shortening the policy to make it more high level and objective; and restructuring the content so that more detailed and prescriptive provisions are transferred to the accompanying procedure and guidance (locally held supporting document).

4. Responsibilities

The Board of Trustees has overall accountability for ensuring conflicts of interest are managed consistently according to relevant legislation, regulations, and good practice.

The Executive Leadership Team (ELT) are responsible for implementation of, and compliance with, this policy in Directorates and teams.

The Chief Executive (Policy Owner) is responsible for ensuring that this policy allows achievement of external and internal standards.

The Regulatory Reporting Manager together with the Policy Owner, is responsible for the development, monitoring, and review of this policy.

All our people are responsible for adherence to this policy.

5. Governance

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| Associated policy document/s | <ul style="list-style-type: none"> • Code of Conduct • Political and Other Affiliations • Fraud, Bribery and Corruption • Procurement Policy | |
| Policy(ies) superseded | N/A | |
| Legislation/ regulatory requirements and standards | <ul style="list-style-type: none"> • Charities Act 2022 • Companies Act 2006 (the CA 2006) • Charity Commission Guidance • Fundraising Regulator • BRC contractual obligations with commissioners | |
| Equality impact assessment | No equality impact identified | |
| Data Protection impact assessment | No data protection impact identified | |
| Environmental impact assessment | No environmental impact identified | |
| Endorsing Authority; Endorsement date | ELT; 08 2024 | |
| Approval Authority; Approval date | BoT; 08 2024 | |
| Policy Owner | Chief Executive | |
| Policy Lead | Regulatory Reporting Manager | |
| Date effective | 08 2024 | |
| Interim update date | N/A | |
| Review date | 08 2027 | |
| Version | 4.0 | |
| Keywords | ethics, disclosure, loyalty, conduct, standards, personal interests, financial interests, bribery, independence, decision making, compliance, impartiality, integrity, conflicts management | |
| Revision history | Version | Summary of change (s) |
| | 1.0 | New Policy |
| | 1.1 | Transferred to corporate policy template |
| | 2.0 | Minor edits to reflect organisational change |

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| | 2.1 | Clarified definitions to increase the chances of disclosure; and added Professional Boundaries |
| | 3.0 | Update to Gifts and Hospitality, policy title and organisational changes. |
| | 4.0 | Compliance with the new Policy and Procedure Framework, transferring operational detail to the related procedure, including examples to cover identified conflict situations |

Appendix: Definitions

Conflict of Interest: any situation in which the personal interests or loyalties of staff, volunteers or office holders could compromise their decision-making in relation to their work. It may arise where personal or family interests and/or loyalties conflict with those of the organisation. A conflict of interest exists even where there is the possibility that our people's personal or wider interests could influence their decision making. Even the perception that there is a conflict of interest can damage BRC's reputation.

Below is a non-exhaustive list with examples of conflicts of interests:

- Having a direct or indirect interest in an organisation with whom BRC does business, as a supplier or partner.
- A private care arrangement between a staff member or volunteer and a former service user.
- Having any relationships with any person who has direct influence over their employment or engagement with the BRC.
- Where an office holder's spouse or other close relative is employed by the organisation and could benefit from decisions made by the office holder.
- Having formal links with another organisation competing with the BRC.
- Having loyalties or duties with another organisation that would be incompatible with their role in the BRC and the service provided by BRC, or impact on the public perception of BRC neutrality and impartiality.
 - *Example 1: An individual who volunteers in the refugee service and has access to sensitive information about service users' legal status or personal circumstances is also employed as a police officer, whose law enforcement duties might be at odds with the confidentiality and support responsibilities required by the BRC refugee service.*
 - *Example 2: An individual who volunteers at a refugee drop-in service starts a job with an agency that is subcontracted by a UK government department responsible for enforcing immigration rules. Such a scenario could put the volunteer in a challenging position, and it could also potentially cause some of BRC's beneficiaries to cease engaging with BRC due to fears of becoming known to the immigration enforcement agencies.*
- Having a close personal relationship with a colleague or a service user which may affect their objectivity in relation to their role and responsibilities, or capacity to make independent/unbiased decisions.
- Accepting gifts, hospitalities, or other benefits from a supplier at any time and especially during contract negotiations
- Participating in a tender process where there is a vested interest in one of the participating organisations.

- Being involved in awarding or subsequently managing contracts or projects to persons with whom there is a financial or personal interest.
- Engaging in political activities that may reflect adversely on BRC or on the Fundamental Principles, as outlined in the Political and Other Affiliations Policy.

This includes the interests of a person connected with a volunteer, staff member or office holder (for example spouse, civil partner, child/stepchild, or a company with which an office holder is associated) and this should be treated as an interest of that volunteer, staff member or office holder.

Consultants: often an employee of a consultancy company that has been engaged to review BRC operations. They often provide advice on matters rather than conduct work for BRC.

Contractors: skilled individuals whom BRC engages to complete a defined piece of work. They can either be engaged with BRC directly or through a supplier.

Financial interest: any direct or indirect monetary benefit that could potentially influence decision making or actions within a particular context

Fundamental Principles: the seven principles that guide the actions and operations of the Movement: Humanity, Impartiality, Neutrality, Independence, Voluntary service, Unity and Universality.

Gifts: something that is bestowed voluntarily and without compensation upon an employee 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.

Legacy: property, money, or other assets that someone leaves in their will to be distributed after their death

International Red Cross and Red Crescent Movement: the international humanitarian network composed of the International Committee of the Red Cross (ICRC), the International Federation of Red Cross and Red Crescent Societies (IFRC), and National Red Cross and Red Crescent Societies.

Office holders: individuals who hold positions of responsibility as members of governing bodies in the organisation, specifically members of the: (i) Board of Trustees, and their Committees (which could include staff, volunteers or people external to the BRC are co-opted for their expertise); (iii) Executive Leadership Team; and (iv) our commercial trading arm, Britcross.

Personal interest: any individual's direct or indirect preference, inclination, passion towards a specific topic, activity or outcome which may influence their behaviour, decisions, or interactions.

Royal Charter: BRC's primary governing document setting out our charitable purpose; and the powers, rules, and other legal responsibilities.