

CONFLICTS OF INTEREST POLICY - VOLUNTEERS

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1. Why we have this Policy

- 1.1. Volunteers bring valuable experience to the IET and conflicts of interest are likely to arise from time to time. The important aspect is that they are properly addressed and managed.
- 1.2. IET volunteers, when engaged in their roles as volunteers, are required to avoid or manage situations where there may be a conflict of interest. Staff employed in the day-to-day management of the IET are under similar obligations.
- 1.3. Conflicts of interest may arise where a volunteer is engaged in activities or decision making for the IET and their personal, professional or family interests and/or loyalties conflict with those of the IET. Such conflicts may create problems, such as:
 - 1.3.1. inhibiting free discussion;
 - 1.3.2. decisions being made, or actions taken, that are not in the best interests of the IET; or
 - 1.3.3. giving the impression that the IET has acted improperly.
- 1.4. The aim of this Policy is to protect both the IET and the individuals involved from any appearance of impropriety. It also enables the IET to identify, manage and monitor actual and potential conflicts of interest to protect the integrity of the IET.

2. Who this Policy applies to

- 2.1. This Policy applies to all IET volunteers.
- 2.2. The requirement to complete and return Conflicts Declaration forms, referred to in paragraph 4.3 below, only applies to members of the bodies defined in para 2.4.
- 2.3. If the requirement to complete and return a Conflicts Declaration applies to you, you must update your conflicts declaration at least every October, and when any material changes occur.
- 2.4. Central governance is a term used in the document to mean those bodies involved in the strategic and financial management of the IET, which include:
 - 2.4.1. The Board of Trustees;
 - 2.4.2. The Council;
 - 2.4.3. The Main Boards;
 - 2.4.4. Committees reporting to the Board of Trustees including Audit and Risk Process, Finance and Investment, Nominations and Succession, and Remuneration; and
 - 2.4.5. The Communities Resourcing Committee.
- 2.5. Volunteers in roles outside of the above who believe they should complete a conflicts declaration can consult the Head of Governance for advice.

3. Other documents you need to read in relation to this Policy

3.1. You should also read the IET's:

3.1.1. [Anti-Bribery and Corruption Policy for Volunteers](#); and

3.1.2. [Gifts and Hospitality Policy for Volunteers](#)

as these may also be relevant and help inform you as to whether you are in a conflict of interest situation or could draw attention to a situation relating to someone else.

4. Overview of this Policy

4.1. This Policy outlines the general obligations of all volunteers to declare and manage actual or potential conflicts of interest. There are then additional obligations for those involved in the central governance of the IET, as defined in paragraph 2.4 above.

4.2. For all volunteers: If you think you have a potential or real conflict of interest, or interest that could be perceived as a conflict, in connection with the IET activity that you are engaged in, you should:

4.2.1. declare the interest at the earliest opportunity – this could be to colleagues or staff members as soon as you identify a potential conflict of interest or, when this is in a meeting, no later than the start of a meeting where a relevant item is being discussed, or at the start of the relevant agenda item; and

4.2.2. allow the other participants in the meeting to decide how the conflict should be managed for example, whether you should withdraw from discussions relating to the issue or step back from being involved in a discussion or decision.

4.3. For those referred to in paragraph 2.4, you need to complete a Conflicts Declaration each October, and update it if any material changes occur during the year. If you have nothing to declare, please state "None" in each box. Completed forms should be returned to the Head of Governance.

4.4. The Head of Governance will maintain the Register of Conflicts of Interests.

4.5. The IET has also produced a set of Frequently Asked Questions (which can be downloaded from the Volunteer Gateway at <https://www.theiet.org/volunteers/active/how-iet-works/conflict-interest.cfm>)

5. The Policy itself

5.1. **For all volunteers:** If you think you have a perceived or real conflict of interest in connection with the IET activity that you are engaged in, you should:

5.1.1. declare the interest at the earliest opportunity to volunteer or staff colleagues; and

5.1.2. allow the other participants in the relevant meeting to decide how the conflict should be managed This may include you stepping out of the meeting for the specific item, not counting in the quorum and not voting on relation to the matter in question, not participating in discussions on the relevant matter, or leaving the meeting just whilst the relevant matter is discussed.

- 5.1.3. Where you are involved in decision making outside a meeting, you should consider stepping back from the decision-making process in consultation with staff and volunteer colleagues.
- 5.2. The Charity Commission has published useful guidance on conflicts of interest, including how to identify them – see Part 3 of https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/636091/CC29.pdf. Although written for trustees, the guidance on identifying conflicts is helpful to all volunteers.
- 5.3. If you receive or offer gifts or hospitality in connection with your role at the IET, you should also refer to the Gifts and Hospitality Policy and ensure that you comply with its requirements.
- 5.4. Where a member withdraws from the discussion or decision at a meeting, the Committee or Board should consider whether the member who has withdrawn should receive redacted minutes in respect of the item that they were excluded from.
- 5.5. A balance needs to be achieved to ensure that the person still receives sufficient information about the activities of the IET generally without disclosing such sensitive personal information that could place the individual in an untenable position.
- 5.6. There are situations where you may participate in discussions from which you could indirectly benefit, for example where the benefits are universal to a large group of people, such as membership fees. This should be minuted accordingly.
- 5.7. All decisions regarding a conflict of interest will be recorded by the person minuting the relevant meeting and reported in the minutes of that meeting. If the meeting is not being minuted, the decision regarding a conflict of interest should be recorded in a file note. The report must record:
 - 5.7.1. the nature and extent of the conflict;
 - 5.7.2. an outline of the discussion; and
 - 5.7.3. the actions taken to manage the conflict (if they are more than simply not being part of the discussion).
- 5.8. If you fail to declare an interest that is known to the Head of Governance or the person chairing the relevant meeting, they will declare that interest.
- 5.9. Where a Trustee is connected to a party involved in the supply of a service or product to the IET, this will need additional scrutiny as the Royal Charter imposes specific restrictions. The information will be fully disclosed in the IET's Annual Report and Accounts.
- 5.10. You must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of invoices and bills, and termination of the contract if the relationship is unsatisfactory.
- 5.11. If a conflict cannot be resolved through the usual procedures, external moderation may be used.
- 5.12. If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the Head of Governance.

- 5.13. Information you provide under this Policy will be processed in accordance with the data protection principles set out in the Data Protection Act 2018.
- 5.14. **For those involved in the central governance of the IET:** Volunteers involved in our central governance (as defined in paragraph 4.1) should complete a Conflicts Declaration (as set out in Appendix 1) each October and update it if any material changes occur during the year. Completed forms should be sent to the Head of Governance, who will maintain a Register of Conflicts of Interests.
- 5.15. The Register will be accessible by the Board of Trustees, the IET's Internal Auditor, the Director of Governance and External Engagement, the IET's General Counsel and the IET's auditors.

6. What happens if you do not follow this Policy

- 6.1. If volunteers allow factors such as other external interests to influence their decision making, they may take decisions which are not in the IET's best interests. This could be costly to the person concerned and damage the work and reputation of the IET. The most common dangers arising out of not following this Policy are:
 - 6.1.1. ineffective decision making;
 - 6.1.2. legal challenge;
 - 6.1.3. loss of trust within the organisation; and
 - 6.1.4. reputational damage, including loss of members, volunteers, public and corporate support.
- 6.2. Volunteers who do not follow this Policy may find themselves subject to action under the IET's Disciplinary Regulations or asked to step aside from volunteering activities.

7. Queries and comments

- 7.1. If you have any queries regarding how this Policy works in practice, or comments or suggestions as to how it could be improved, please contact the Volunteer Support Unit - volunteer@theiet.org.

APPENDIX 1
CONFLICTS DECLARATION FORM

CONFLICTS DECLARATION

I, as a volunteer involved in the central governance¹ of The Institution of Engineering and Technology (“IET”) have set out below my interests which create, or might be perceived as creating, a conflict of interest in accordance with the IET’s Conflicts of Interest Policy.

Category	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family or connected persons ² or some other close personal connection
Current employment	
Any previous employment in which you continue to have a financial interest	
Appointments (voluntary or otherwise) e.g. trusteeships, directorships, local authority membership, tribunals etc.	
Membership of any professional bodies. Special interest groups or mutual support organisations	
Investment in unlisted companies, partnership and other forms of business, major shareholdings (more than 5% of issued capital or voting rights ³) and beneficial interests	
Gifts or hospitality offered to you by, or offered by you to, external bodies in the last 12 months and whether this was declined or accepted (which has not been previously declared)	
Any contractual relationship with the IET or any of its subsidiaries	
Any other conflicts that are not covered by the above	

To the best of my knowledge and belief, the above information is complete and correct. I undertake to update the information as necessary, and to review the accuracy of the information at least annually. I give my consent for the information to be used for the purposes described in the IET’s Conflicts of Interest Policy and for no other purpose.

Signed:

Position:

Date:

¹ See paragraph 2.4 of the Conflicts of Interest Policy.

² Connected person is defined in the Charity Commission Guidance as follows: In broad terms this means family, relatives or business partners, as well as businesses in which an individual has an interest through ownership or influence. The term includes a spouse or unmarried or civil partner, children, siblings, grandchildren and grandparents, as well as businesses where a the individual or family member holds at least one-fifth of the shareholding or voting rights.

³ For Trustees, the threshold is 1%.

APPENDIX 2
CONTROL SHEET

IET Policy: Conflicts of Interest – Volunteers v2.1

Control Sheet

Policy

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Document adopted on: 1 October 2016
Next review date: September 2022

Review/change history

Date of Review/Change	Summary of changes	Version no.
October 2016	First version	1.0
March 2017	Minor amendments following suggestions from Council	1.1
May 2018	Rewritten for clarity in order to make clear that the Policy applies in general terms to all volunteers and that the annual declarations applies to specific groups of volunteers. Some repetition removed.	1.2
August 2019	Reviewed by General Counsel – amendments made regarding identification and dealing with conflicts	2.0
June 2020	Reviewed by General Counsel – reference to GDPR removed	2.1