

Conflict of Interest Policy

September 2025

Conflict of Interest Policy

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| Policy Title | Conflict of Interest Policy |
| Version Number | V2 |
| Author | Folake Segun, Chief Executive HW Lambeth |
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1. POLICY STATEMENT

Healthwatch Lambeth staff, trustees, and volunteers have a responsibility to put the interests of the organisation before their own personal pursuits. The aims of this policy are to ensure transparency and to protect both the organisation and the individuals concerned from any appearance of impropriety.

Healthwatch Lambeth strives to ensure that its work represents the varied and broad issues and interests of communities using health and social care services in Lambeth but recognises that people who become involved in Healthwatch Lambeth may have other interests of relevance to health and social care services and their commissioning and delivery, which may lead to a conflict of interest.

All staff, trustees, and volunteers are required to identify and disclose any activities and relationships that might give rise to conflicts of interest or the perception of conflicts of interest, to ensure that such conflicts are properly managed or avoided.

When properly managed, an individual's activities can usually proceed as normal whilst at the same time upholding their obligations to Healthwatch Lambeth and protecting the integrity and reputation of the organisation. However, conflicts which are not managed effectively may jeopardise public confidence and damage the credibility of the organisation and of the individuals concerned.

This policy sets out the framework for declaring and assessing conflicts of interest and how conflicts will be dealt with in terms of Healthwatch Lambeth work.

This policy reflects the Standards of Business Conduct set out by the Committee on Standards of Public Life, also known as the **"Nolan principles"**.

2. WHAT IS A CONFLICT OF INTEREST?

A conflict of interest may arise where a Healthwatch Lambeth staff member, trustee, or volunteer has a personal interest and/or loyalty to another individual or group which is likely to be in conflict or may appear to be in conflict with the interests of Healthwatch Lambeth.

This could inhibit free discussion, result in decisions or actions not in the interests of Healthwatch Lambeth, give rise to an appearance of bias or favouritism towards

another individual or organisations within or outside of Healthwatch Lambeth, or create or appear to create preferential personal gain.

There can be situations where the appearance of a conflict of interest is present even when no conflict exists. When evaluating a potential conflict of interest, it is important to consider how it might be perceived by others.

3. EXAMPLES OF CONFLICTS OF INTEREST

Healthwatch Lambeth has a broad remit and may be engaged in looking at any aspect of health or social care provision, covering many different services, service providers, and service commissioners.

- **Health services** are provided by local hospitals, GP surgeries, chemists, opticians, etc. Some are public bodies and others are run as businesses. There are also some voluntary sector providers, for example some Hospices. Private providers are included where they are delivering services bought or commissioned by Lambeth Council, the NHS, or the South East London Integrated Care Board (SEL ICB).
- **Social care services** are provided by the local authority, private sector businesses, social enterprises, and voluntary organisations.
- **Services commissioners** act as purchasers of health and social care services and make decisions about how money is spent to treat patients and provide care services. Commissioners include Lambeth Council, the NHS, and the SEL ICB.

There is no definitive list of conflicts, and every situation should be taken on its own merit. Some examples of areas where conflicts may arise are:

- Staff, trustees, or volunteers working for or having a commercial relationship with a service provider or commissioner.
- Voluntary or remunerated positions, including local authority, decision-making panels, or other public positions.
- Financial interests where there appears to be an opportunity for personal financial gain, such as shareholdings or beneficial interests in organisations where services or contracts are being procured.
- Personal relationships with service users, providers, or commissioners.

- Personal relationships within the local Healthwatch network or Healthwatch England.
- Selection and recruitment process.
- Membership of political parties.
- The offer of gifts and hospitality, whether accepted or declined.

This list is not exhaustive.

4. DECLARATION OF INTERESTS

When a staff member, trustee, or volunteer joins Healthwatch Lambeth staff, they will complete a declaration of interest form (appendix 1). This will be reviewed at least annually and updated as soon as circumstances change. If in doubt about a conflict of interest, the individual should declare it in the interests of transparency, and the Chief Executive will determine whether it constitutes a conflict.

Individual forms will be used to create a Register of interests (appendix 2) which will be maintained and stored by Healthwatch Lambeth.

5. ACTION TO TAKE WITH A CONFLICT OF INTEREST

If a Healthwatch Lambeth staff member, trustee, or volunteer has any interest in a matter under discussion at any meeting where they represent Healthwatch Lambeth, they should declare it at the earliest opportunity. They should withdraw from that meeting or discussion until agreement has been sought from the Healthwatch Lambeth Chair regarding action to be taken.

Where the conflict arises as a result of an item on the agenda for Healthwatch Lambeth Board meetings, appropriate action to be taken will be decided by a simple majority vote of the Board. A quorum must be present, excluding the interested party who may not vote on matters reflecting their own interests. The Chair has the ultimate responsibility for agreeing on how to manage any conflict of interest if there is a tied vote.

Options available include, but are not limited to:

- Withdrawing from the room for all or part of the discussion.
- Remaining in the room but not taking part in the discussion.

- Taking part in the discussion but not having voting rights.
- Restricting access to papers in advance of the meeting.
- No action to be taken.

Each matter will be assessed on its own merit and the action taken will be noted in the minutes of the Board meeting.

Where a Board member benefits from a decision, this will be reported in the annual report and accounts in accordance with the current 'Charities Statement of Recommended Practice'.

6. FAILURE TO DECLARE AN INTEREST

It is the responsibility of each individual to keep their declaration of interests record up to date.

If an individual fails to declare an interest, but that interest is known to others, the interest can be declared by another individual. Everyone should speak up if they have any concerns about how conflicts of interest are being managed.

If an individual has failed to disclose an interest, they will be asked to provide a written explanation of the reasons why the information was withheld.

Depending on the nature of the breach of policy, it may be decided that no action is required other than ensuring the register of interest is updated, or in serious cases a suspension or termination of activity may be considered.

7. DATA PROTECTION

The information provided will be processed in accordance with General Data Protection Regulations (GDPR) and will only be processed to ensure that individuals act in the best interests of Healthwatch Lambeth. The information provided will not be used for any other purpose.

8. PROCEDURES FOR REVIEW

Healthwatch Lambeth undertakes to:

- Publish the most up-to-date Conflict of Interest policy document on the

Healthwatch Lambeth website.

- Review and obtain Board approval to this Conflict of Interest policy every three years.
- Ensure all Healthwatch Lambeth staff, trustees, and volunteers are familiar with the policy and refresh their understanding and awareness of individual responsibilities regarding conflicts of interest.
- Ensure all staff, trustees, and volunteers complete a declaration of interest form upon commencement of employment or volunteering.
- Ensure that all staff, trustees, and volunteers update their register of interest annually, or as soon as possible following any changes in individual circumstances.
- Ensure Healthwatch Lambeth board meetings have processes in place to note interests of Board members and attendees.
- Ensure that the interests of Healthwatch Lambeth staff, trustees, and volunteers involved in an activity are made known to all interested parties, and appropriate action is taken in accordance with the policy above.

APPENDIX 1 – DECLARATION OF INTEREST FORM

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| Name: | | Date: |
| Position held: | | |
| Date of commencement of interest | Nature of interest and potential impact | |
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| <p>To the best of my knowledge the information supplied above is correct and complete.</p> <p>I understand that it is my responsibility to declare any conflict of interest, business or personal that relates directly or indirectly to me or any relation in any contract, proposed contract or any other matter when present at a meeting.</p> <p>I undertake to update as necessary the information provided and to review the accuracy of the information on an annual basis.</p> <p>I give my consent for this information to be used for the purposes described in the Conflict of Interest Policy and Procedures.</p> | | |
| Signature: | | Date: |
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[illegible]