



Welsh Refugee Council Conflict of Interest Policy

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Next revision: August 2021	Version 3
Reviewed & approved by Senior Leadership: Andrea Cleaver, CEO on 20 July 2020	Signature 
Board of Trustees 27 July 2020	Signature of Trustee Harry Iles, Chair 

1. Introduction

All Trustees and staff of WRC will strive to avoid any conflict of interest between the interests of WRC and their personal, professional, and business interests. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

The purposes of this policy are to protect the integrity of WRC's services, to enable clients and funders to have confidence in the organisation's integrity, and to protect the integrity and reputation of staff and Trustees. This policy will help staff and volunteers to identify situations of conflict of interest and how to deal with them. There is a specific Conflict of Interest Policy for Trustees.

This policy needs to be read in conjunction with:

- Confidentiality policy
- Relationships at work policy
- Referral and sign-posting procedures
- Equal opportunities policy

2. Principles of service delivery

Conflict of interest situations should be identified, where possible avoided and managed effectively to ensure that the advice offered to a WRC client is impartial and independent.

All WRC staff and volunteers should be open, honest and transparent when situations of conflict of interest, or potential conflict of interest, arise.

3. Conflict of Interest in Advice Services

It is imperative that staff and volunteers provide impartial and independent advice to the client. Conflicts of interest in advice services may arise where:

At reception:

WRC is already advising the 'other party' in cases of divorce or domestic violence.

In such cases, Reception staff and volunteers should ask the client whether there is any possibility that his/her partner has sought advice in the same organisation and check the central record of clients against the name provided.

If the Welsh Refugee Council has advised the other party, the client must be informed of the conflict, whilst maintaining confidential information about the other party, and be referred to another appropriate organisation following the referral procedure.

During first contact with advisers

If WRC discovers in the first advice session that they are advising the ex-partner of the client or a third party in the same case, the worker should:

Explain the conflict to the client and that WRC cannot act on the case. Refer the client to an alternative organisation. If an alternative organisation cannot be found, the worker should contact the Line Manager to make alternative arrangements.

During ongoing advice work

If WRC discovers during ongoing advice sessions that it has been acting for both parties on the same case (e.g. a landlord asks for advice on how to evict a tenant; the tenant approaches the WRC for advice on how to avoid eviction). When this happens, the worker or volunteer should:

- Discuss the situation with the Line manager.
- Continue to act for whichever client has been receiving the service longest;
- Cease acting on the other case immediately, if possible.

All efforts should be made to refer the client to an alternative organisation as soon as possible and agree interim arrangements with the Line Manager (e.g. ensure that cases are dealt with by separate workers).

Other potential conflicts of interest

Examples of other potential conflicts of interest could include:

- The client is requesting advice on an issue that involves someone who works within the WRC as a volunteer, staff or Trustee.
- Advising relatives of staff, volunteers and Trustees.
- When the client enquiry involves taking action against the worker, the WRC or its funders.
- When the worker has any personal relationship with the client.

If any of the above situations arise the worker or volunteer should discuss the situation with the Line Manager and agree upon appropriate action.

Situations in which the organisation must continue to act

At times there are limited services available to refugees so the management of conflict of interest situations cannot always automatically involve referral to alternative services. In such circumstances appropriate measures must be taken to ensure that clients receive independent and impartial advice and assistance.

WRC may re-allocate a case to an alternative worker or team and ensure the workers do not discuss the case. WRC may decide on more regular supervision and review of these cases.

WRC will prohibit relatives of employees from serving as Board members. In addition, Trustees should not be involved in any discussions that involve their relatives. Further guidance is provided in the Trustee Conflict of Interest Policy.

Possible conflicts with the policies of funders

The funding basis of some advice work services may appear to present potential conflicts of interest. Examples of this may be found in advice work services funded by Government departments to undertake that advice work on behalf of clients within the NASS system.

WRC's funding strategies will be consistent with its principles and aims as stated in the governing document. Any staff member or trustee who is concerned that a conflict of interest between WRC and a service funder may arise should raise the issue with the relevant line manager.

Funding arrangements and grant agreements should always clearly define the role and remit of the advice services to be offered by the WRC. This should include details of any conditions or limits to service delivery in terms of target client groups, scope and level of advice services delivered. Clients should be made aware of how services are funded and of any limits or conditions that apply, before services are provided.

4. Monitoring and Implementation

The Chief Executive will be responsible for ensuring this policy is implemented throughout the organisation.

All staff and volunteers will be made aware of this policy during induction, when joining WRC. All staff will be required to complete a Staff conflict of Interest Disclosure Form on joining WRC and will be expected to update it annually. If any relevant changes occur in their affiliations, duties or circumstance, staff will be obliged to file an amended Form at the earliest possible opportunity.

Cases of potential conflicts of interest will be managed and monitored in order to enable WRC to provide services with integrity and to protect the interests of clients, staff and volunteers.

Welsh Refugee Council Staff Conflict of Interest Disclosure Form

Name: _____ Date: _____

It is the policy of WRC to address how issues of actual, potential and perceived conflicts of interest involving WRC trustees should be identified, disclosed and managed. This form is designed to identify and disclose known conflicts in an effort to properly manage them.

I have read WRC's Conflict of Interest policy approved by the Board of Trustees and understand that as a WRC staff member it is my obligation to act in a manner which promotes the best interests of WRC and to avoid conflicts of interest when taking actions on behalf of WRC.

My answers to this disclosure form are correctly stated to the best of my knowledge and belief. Should a possible conflict of interest arise in my duties with WRC I recognise that I have the obligation to notify my line manager and to abstain from any participation in the matter until WRC determines whether a conflict exists and how that conflict shall be resolved.

If any relevant changes occur in my affiliations, duties, or financial circumstances, I recognise that I have a continuing obligation to file an amended "Conflict of Interest Disclosure Form", at the earliest possible opportunity.

Signature

Date

Please complete the following questions and submit this form to your line manager.

1. Are you or a member of your immediate family a client, trustee, employee, volunteer or regularly retained consultant of any organisation that presently has business dealings with WRC, or which might reasonably be expected to have business dealings with WRC in the coming year?

_____Yes _____No

If yes, please list the name of the organisation, the position held, and the nature of the business which is currently being conducted with WRC or which may reasonably be expected to be conducted with WRC in the coming year:

2. Do you or does any member of your immediate family have a financial interest, direct or indirect, in an organisation which currently has business dealings with WRC, or which may reasonably be expected to have such business dealings with WRC in the coming year?

_____Yes _____No

If yes, please list the name of the organisation, the nature of the interest and the name of the person holding the interest, and the nature of the business which is currently being conducted with WRC or which may reasonably be expected to be conducted within the coming year:

3. Have you or an immediate family member accepted gifts, gratuities, lodging, dining, or entertainment that might reasonably appear to influence your judgment or actions concerning the business of WRC?

_____Yes _____No

If yes, please provide details below:

If any material changes to the responses provided on this disclosure form occur, the staff member is required to update the information on this form in writing and submit the update to their line manager at WRC.