

**Conflict of Interest Policy**

This policy and procedure aim to identify and deal with any potential conflicts of interest arising between ETI employees and independent activities they may carry out. Nothing in this policy should be interpreted to detract from statutory rights or ethical responsibilities such as member confidentiality.

ETI recognises that its employees have diverse interests and contacts within the local, national and international community and it considers that links between its employee and outside bodies are beneficial to the ETI, its members and its individuals. However it also recognises that it is possible that such connections may give rise to potential conflicts of interest.

Each employee has an obligation to act in the best interests of ETI in relation to their ETI duties activities and employment

# What is a conflict of interest?

It is impossible to list all possible conflicts of interest but they would include the following:

Independent consultancy, advisory or salaried activities that meet the following criteria will be regarded as a potential conflict of interest:-

1. Any involvement by the employee with ETI member companies, with regard to current or past activities, that have a direct bearing on that member’s ability to implement its membership commitments, or ETI’s obligation to assess that member’s performance.

b) Any involvement with any organisation that directly undermines the interests or reputation of the ETI.

c) A private or personal interest which is likely to appear to influence the objective exercise of an aspect(s) of his/her ETI duties.

Any member of an employee’s close family; close personal friends; and any other person with whom the employee has a relationship which is likely to appear, *to a reasonable* *person*, to influence his/her objectivity.

# What is the process of recognising a potential conflict of interest?

ETI recognises that, in general, individuals will recognise conflicts of interest and will want to ensure that there can be no perception of their receiving an inappropriate advantage and that they are personally beyond suspicion. It also recognises that, in most cases, potential conflicts of interest will be easily avoided or resolved by informal action either by the individual concerned or through discussion with his/her line manager

When an employee proposes to undertake activities that are potential conflicts of interest as defined in above, they shall provide written details to their line manager prior to confirming acceptance.

# What is the process of resolution of a conflict of interest?

 It is not necessarily the case that an employee cannot or should not carry out independent activities that present a potential for conflict of interest. Depending on the severity of risk to ETI, the line manager may decide that it is feasible to continue with the assignment in question, while removing him/herself from any decision, meeting or other duty as employee where the conflict could arise or simply by declaring the conflict to concerned parties.

If the line manager concerned considers the proposed activities present an unacceptable conflict of interest, s/he will discuss this with the employee at the earliest possible opportunity. This will normally be within 2 working days.

If the line manager considers that the employee’s proposed activities are likely to create a significant conflict of interest that cannot reasonably be managed, the line manager shall refer any areas of doubt to the Executive Director for advice and guidance. The line manager will then immediately advise the employee in writing of the concern that has been expressed and the fact that the matter has been referred to the Executive Director.

The views of the Executive Director on any potential conflict of interest will normally be finalised and communicated to the employee within 2 working days from the date the Executive Director was advised of the issue. The employee will be entitled to meet with the line manager and Executive Director to discuss their views in the event of any disagreement.

Should the employee disagree with the final decision of the Executive Director s/he may appeal directly to the Chair. The Chair’s decision on the matter will be final.