

OXFAM GB
Conflict of Interest Policy
January 2019

Title:	Conflict of Interest Policy
Author:	HR Policy Team
LT Sponsor:	Tina Proudlock
Area of Governance:	Human Resources
Date for Renewal:	January 2022
Approved by:	Leadership Team
Geographical Scope:	Worldwide, except in countries where the following policy contravenes local legislation. In these cases, local legislation must be followed.
Confidentiality:	Public policy: can be circulated outside OxfamGB.

Policy Statement

We recognise that Oxfam employees bring skills and experience to work gained through their active involvement in the society we live in and this is immensely valuable to Oxfam and the work that we do. However, as a charitable organisation that relies on funding and goodwill from the public, we rely on our employees to conduct themselves appropriately and to declare any activities in their private lives and any personal or familial relationships that may present a conflict of interest with Oxfam's work or bring our name into disrepute. Any breach of this policy will be addressed and could result in disciplinary action.

This policy does not form part of an employees' terms and conditions of employment and may be subject to change at the discretion of management.

Please note that the facility to record Declaration of Interests online via PeopleSoft is currently live and being rolled out in stages and is being communicated via workplace.

Procedure

[New Starters](#)

[All Employees](#)

[Principles](#)

Useful Links:

[Blogging Guidelines](#)

[Code of Conduct](#)

[Dealing with Problems at Work Policy](#)

[One Oxfam Anti-Fraud & Corruption Policy](#)

[Anti-Bribery Policy](#)

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[Use of information and resources section updated January 2020 to provide clarity around whistleblowing.]

Procedure

New Starters:

1. All new employees will be required to complete a declaration of conflict of interest section in their contract of employment.
2. HR will immediately notify the recruiting manager if a potential conflict of interest is declared.
3. The manager should discuss the potential conflict with the new employee and members of the Legal Team and HR. A [risk assessment form](#) must be completed and a copy sent to HR (to be placed in the employee's personal file)
4. If measures cannot be put in place to avoid the conflict of interest, a decision may be made, with advice from HR, to withdraw the offer of employment on the basis that it represents a significant risk to Oxfam GB. Evidence would need to be provided.

All Employees:

1. All employees will be required to complete a Declaration of Conflict of Interest form on PeopleSoft on an annual basis. *For Trading in Second Hand Goods [please use this form](#).
2. Outside the annual process, employees must notify their manager as soon as they know of a possible conflict of interest (this might be if their job or personal circumstances change).
3. If the manager believes a conflict of interest is evident, they should talk to the employee to see if there is a way it can be resolved. Measures may need to be put in place to manage the conflict of interest. The manager needs to complete a [risk assessment form](#). The manager must send a copy of the completed risk assessment form to HR as a copy must be held in the employee's personal file.
4. If the matter cannot be resolved or measures put in place are not working, the formal procedure in [Dealing with Problems at Work Policy](#) should be followed. For volunteers, managers should follow the procedure in [Resolving Differences](#).
- 5.

Principles

Oxfam GB requires all those who work for us (whether in a voluntary, temporary or full-time paid capacity or otherwise) to act in the best interests of Oxfam and its international affiliates. By agreeing to work for Oxfam, you accept a duty to act in Oxfam's best interest.

As an Oxfam employee, you must not (whether in your own name, anonymously or under a pseudonym):

1. Allow your activities outside work to interfere with your work within Oxfam GB.
2. Allow any conflict of interest between your duty to act in the best interest of Oxfam GB and your private interests (including those of a third party).

3. Exploit Oxfam GB's name, or make use of or exploit your connection with Oxfam GB or information obtained during your duties to further your own private interest or those of any outside organisation to the detriment of Oxfam GB.
4. Act in a manner likely to bring Oxfam GB into disrepute or affect its reputation for objectivity, integrity and accountability.

This does not mean that every outside activity is a potential conflict of interest. There will be many activities that have no bearing on your work at Oxfam and there may be other activities where, provided they are declared in advance, a conflict of interest can be avoided.

Involvement could be as a Company Director or Owner/Partner, working for an organisation, promoting an organisation or having a financial interest in an organisation, including making or receiving loans. It could also be involvement with an individual who has a business relationship with Oxfam GB. It does not matter whether the arrangement is paid or unpaid.

What kind of associations can give rise to a conflict of interest?

- Associations with organisations or individuals who have a trading relationship with Oxfam GB as its supplier or customer.
- Associations with organisations tendering for work from Oxfam GB. You need to avoid a situation where your knowledge or involvement in the tendering process could be viewed as influencing a commercial decision in favour of an organisation with which you have a link. This includes partner organisations.
- Associations with Organisations that supply goods and services to Oxfam GB. This becomes a matter of concern if you are involved in decisions that might affect the choice of a supplier, the price paid for goods or services or arrangement for the provision of goods and services.
- Active political involvement in a political party or organisation (see below).
- Employing family members, or people with whom you have a close personal relationship, can create a conflict of interest (see below).

If you are in doubt about an outside activity in which you are already involved when you join Oxfam GB, please talk to your manager. This particularly applies to people joining Oxfam GB to work on a fixed-term, part-time or consultancy basis with existing outside business commitments. You should seek the permission of your manager if you intend to use material or information associated with your work or make specific reference to Oxfam GB.

Failing to declare a conflict of interest may expose a member of staff or volunteer to allegations of bribery, nepotism (see One Oxfam [Anti-Fraud & Corruption Policy](#)) or other disciplinary, civil or criminal offences.

Personal and Familial Relationships

The employment of people who are related in a direct management line can create a conflict of interest. Therefore, recognised partners, people closely related to, or in a personal relationship with, an Oxfam GB employee cannot be employed into a position where they would be in a direct management line. The same applies to the engagement of consultants and the taking on of volunteers. Advice should be sought from HR and alternative line management arrangements made.

Where existing employees are subsequently in a personal relationship or become related, they should discuss their employment position with their Human Resources team. The purpose of this review is to ensure that matters of management, supervision, audit and possible role conflict can be considered, as well as any possible benefits to Oxfam GB. The objective is to be reasonable, to safeguard Oxfam GB and to maintain good employee relations.

If, during their Oxfam GB employment, an employee is considering employment, a voluntary role or a consultancy contract for a close personal relative or friend, the relationship must be declared in writing and any decision referred to the employee's manager. If the employee has concerns about a relationship and are not sure if it comes within the scope of this procedure, they are advised to discuss this matter, in confidence, with their Human Resources team.

In certain circumstances, where your family or close personal contacts work for organisations or partners with which Oxfam GB conducts business, it is important that such relationships are known in advance and you are not placed in a difficult position. Business dealings on Oxfam GB's behalf with someone in another organisation whom you know well on a family or personal basis, could affect Oxfam GB's reputation for integrity. In these circumstances employees should discuss the relationship with their manager.

Internet Web Sites

If you are developing an Internet web site for yourself or an outside organisation, you must not use Oxfam GB copyright material or information (whether confidential or otherwise) and must not link to any Oxfam website or online documentation without the prior written permission of your manager.

Purchasing

Anyone involved in purchasing, tendering or commissioning must not have an undeclared association with any outside organisation involved in the process. Where an association does exist, you will not be permitted to become involved in the commercial processes. Unless your manager has given you specific permission, you must not provide information or assistance to any organisation or individual tendering for work from Oxfam GB. Everyone tendering for work needs to feel that they have received fair and equal treatment.

Private Purchases and Gifts

You and your immediate family must not accept gifts from organisations or individuals with whom you have or might have dealings on behalf of Oxfam GB. This can include goods and services in kind or at preferential rates, cash and entertainment outside the scope of normal business hospitality.

You can accept normal business hospitality on a reasonable scale when representing Oxfam GB and its interests. You should not place yourself in a position where the hospitality could be interpreted as a form of inducement and must comply with [Oxfam GB's Anti-Bribery Policy](#).

If you have any questions or concerns, please speak to your manager.

Political Activities (see *UK Political Parties*)

Oxfam GB supports the right of employees to be politically engaged and active.

However, active involvement in a political party or organisation can give rise to questions of impartiality. What is acceptable is dependent upon the individual's job, their level in the organisation and the extent of their political involvement.

You should talk to your manager if:

- You currently hold an elected position in Local Government at any level.
- You intend to re-stand for a position you already hold. Where there is an existing agreement to holding elected office, Oxfam GB will normally allow councillors to stand for re-election.
- If you seek nomination or are selected as a candidate as the immediate consideration is to safeguard Oxfam GB's reputation for impartiality.
- You act as a voluntary advisor to an elected politician.
- You hold an elected office in a political party.
- You wish to stand for election to local Council, parliament or political party.

Standing for election requires consent from Oxfam GB which will not be unreasonably withheld. However, we retain the right to consult with you on how to conduct yourself so that Oxfam's name does not come into disrepute.

If you stand for election as a Member of Parliament or an Assembly, you will be granted unpaid leave of up to six weeks prior to election. If you are elected, you will be required to resign from Oxfam GB immediately.

UK Political Parties

You should inform your manager if you intend to seek nomination as a candidate for:

- European Parliament
- UK Parliament
- Scottish Parliament/Welsh Assembly
- Any Northern Ireland-wide politically elected body
- Local Government

In the case of local government elections, you must campaign in your own time and make sure that there is no conflict with your work at Oxfam. Polling day itself should be taken either as holiday or as unpaid leave. You can be elected to a position within local government and remain in employment if there are no issues of impartiality or conflict of interest. Employees are expected, where possible, to schedule council commitments outside core working hours but may agree a reasonable working schedule with their manager to make up lost hours. Active campaigning during working hours is not acceptable.

If one of your family or a close personal contact is standing for election it is acceptable to express personal support for the individual standing for election, but you should not use Oxfam GB's name and where your support extends to political support this will be subject to the considerations outlined above.

Trade Union/Staff Association Activities

Employees are free to take part in activities organised by a union/staff association that is recognised by Oxfam GB. Please refer to the [Employee Relations and Involvement Policy](#).

Employees who are elected as accredited trade union representatives may, from time to time, comment on political matters whilst representing the interests of their members. When expressing such views, employees should state that they are expressing these views as a trade union representative and that they are not necessarily reflecting the views of Oxfam GB.

Use of information and resources

Anyone working for Oxfam GB must not use Oxfam GB's resources to further their private interests or do any work for an outside company. You should seek the permission of your manager before using Oxfam GB information or making reference to Oxfam GB in any book, article, lecture or statement to the press.

You must not reveal or share confidential information, including personal or sensitive data, received in the course of your duties, to a supporter, supplier, competitor or other organisation without authorisation from relevant persons. This is a commitment to confidentiality gained during employment and continues after you have left Oxfam GB. Anyone who deliberately reveals such information maybe in breach of Oxfam's Data Protection Act obligations and the Code of Conduct in relation to acting appropriately, professionally and with integrity and accountability to the people we work with, will be dealt with in accordance with the [Dealing with Problems at Work Policy](#).

A conflict of interest or information disclosure is different to sharing information when reporting misconduct under whistleblowing. An employee whom reports wrongdoing to a 'prescribed person' (normally a legal adviser, their employer, relevant party such as a regulatory body or other) as part of a 'protected disclosure is considered a whistleblower.

If an individual has a concern with reasonable belief that the concern is in the public interest, even if it is later discovered that you are mistaken, under whistleblowing protection the employee will not be at risk of losing their job or from suffering any form of detriment or retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice. Those found to be making false allegations maliciously maybe subject to disciplinary action should any malicious intent be proven.

Survivors whom make a whistleblowing disclosure to a person or body (other than their employer or a prescribed body) will be protected from dismissal or any other detriment if they reasonably believe that the disclosure is in the public interest, substantially true and they act reasonably and responsibly in making that disclosure. It is advised that they have exhausted all other reporting routes open to them first by reporting concerns to Oxfam, a prescribed person or legal adviser.

You are not permitted to take your partner or any other personal contact on a business trip at Oxfam GB's expense, unless it is a requirement of the formal duties of the visit and has been approved in advance (in writing) by the appropriate Director. In any other circumstances, if you wish to be accompanied, you must have

the authorisation of your manager and all expenses for the companion, including travel and accommodation, must be paid for.

Employees and volunteers working in Shop Operations are not permitted to re-sell items purchased in Oxfam GB shops. If they are involved in trading in second hand goods outside their Oxfam GB role they must declare this to their manager.

Employee concerns

Any employee who has concerns about breaches of the principles outlined in this policy should raise them via the [Disclosure of Malpractice at Work Policy](#).

Any employee who feels they have been unfairly treated under the terms of this policy may raise a grievance under the [Dealing with Problems at Work Policy](#).