Crawley District Scouts

Charity Registration Number: 305875

Date of Conflicts of Interest Policy Statement: May 2024

**1. Introduction**

1.1 Crawley District Scouts (the District) is a separate educational charity and is registered with the Charity Commission. The District is a part of the Scout Association in the UK and as such is required to comply with the Policy Organisation and Rules of the Scout Association (POR). The Group is also required to comply with the current Charities Acts.

1.2 The main aim of Scouting is to actively engage and support young people in their personal development, empowering them to make a positive contribution to society.

1.3 To comply with legislation, all charities must have a governing body, which in Scouting is call a Trustee Board. Members of the Board must act collectively as Charity Trustees of the District.

1.4 The District Trustee Board plays a vital role in the running of the District. Trustee Boards make decisions and carry out administrative tasks to ensure that the best quality Scouting can be delivered to young people in the District.

1.5 Crawley District Scout Council is committed to carrying out its activities fairly, honestly and openly. We believe that we should NOT receive benefits of any kind from third parties which might reasonably be seen to compromise our personal judgement and integrity.

1.6 This policy applies to all volunteers working for us or on our behalf, including trustees and volunteers at all levels. The policy applies to all processes and to any dealings with any members, partners and suppliers.

1.7 The aim of this policy is to help volunteers understand what to do if they are offered gifts and hospitality, and to provide a clear framework to ensure that all relevant parties understand what constitutes bribery, corruption, or exposes the charity to accusations (founded or unfounded) of unethical or unlawful behaviour.

**2. Conflicts of Interest**

2.1 A conflict of interest is any situation in which a trustee's personal interests or loyalties could, or could be seen to, prevent the trustee from making a decision only in the best interests of the charity.

2.2 a conflict of interest exists even where there is the possibility that a trustee's personal or wider interests could influence the trustee's decision making. Even the perception that there is a conflict of interest can damage the charity. Where the perception is not accurate because there is no conflict of interest, the Trustees should always be able to respond appropriately to the situation by managing the risks to the charity and being prepared to explain how they have made their decisions only in the best interests of the charity.

2.3 Conflicts of interest relate to a trustee's personal interests and the interests of those connected to them. This means, for example, that there is a conflict of interest where there is a proposed transaction between the charity and a connected person. Similarly, there is a conflict of interest where there is a benefit or a potential benefit to a connected person.

2.1 The District Administrator will maintain a register of conflicts of interest in which every Trustee will declare conflicts of interest upon their appointment. They will add further entries into the register as they arise.

2.2 There will be a standard item on the agenda of every Trustee Board meeting and any conflicts of interest relevant to that meeting's agenda will be recorded in the minutes. These can also be added if they become apparent during the meeting.

2.3 Depending on the significance of the conflict of interest the Trustees may decide that the Trustee with the conflict my not vote on a decision, or take part in the discussion, or that they should leave the room for that particular item. They may also decide that none of these is necessary. It will be for the Trustees to decide, but that decision must be recorded in the minutes.

**3.** **Bribery**

3.1 A Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

3.2 Bribery includes offering, promising, giving, accepting or seeking a bribe.

3.3 All volunteers have a responsibility to help in the prevention, detection and reporting of bribery. Specifically, you must not:

3.3.1 give or offer any payment, gift, hospitality or other benefit in the expectation that an advantage will be received in return, or to reward any business received

3.3.2 accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else

3.3.3 give or offer any payment (sometimes called a facilitation payment) to a government or local council official in any country to facilitate or speed up a routine or necessary procedure

3.4 You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

3.5 you must not knowingly fail to challenge or report suspicions of bribery or corruption

**4. Gifts or donations received by Crawley District Scouts**

4.1 Crawley Scouts in deciding whether to accept or decline a donation or gift will consider the charity's best overall interest and will not accept donations from donors whose activities appear to be in direct conflict with our charitable aims and objectives.

4.2 A volunteer or any member of their family/friends should not, directly or through others, solicit or accept money, gifts, hospitality or anything else that could influence or reasonably give the appearance of influencing the relationship with that organisation or individual.

4.3 Unless you have been informed otherwise you may accept a gift to a nominal value of £15, such as a box of chocolates or biscuits, advertising novelty or small seasonal gift when it is customarily offered to others having a similar relationship with that individual or organisation. It must be made clear to the person or organisation that is giving the gift that the gift will be assessed by the District where a decision will be made as to how to use the gift.

4.4 Crawley District Scouts will not take gifts from organisations or individuals who participate in activities which:

• could cause detriment to the charity’s reputation

• will disproportionately decrease the amount of donations to further the work of the charity.

• undermine our vision and values

• are associated with unsuitable products, corporate and individuals e.g. arms dealings and tobacco

• are from individuals, groups or organisations which are known to take advantage of young or vulnerable people

• are personal gifts to Crawley District members, which should be discouraged at all times

• are from unknown sources of funding. Crawley District will take reasonable steps to determine the ultimate source of funding for each gift and satisfy itself that the funds do not derive, directly or indirectly, from activity that was or is illegal.

• potentially harm our relationships with other donors, service users, stakeholders or volunteers.

• expose us to undue adverse publicity or reputational risk.

• require unacceptable expenditure or additional charity resources

4.5 If supporters wish to make a donation to a specific area of the District’s work then they make a specified donation by providing written instruction to this effect with their donation. Crawley District will always respect this. If Crawley District is unable to accept the request for the specified donation and the sponsor does not want the donation used in any other way then we will refund the donation.

**5. How to raise a concern**

5.1 If any member of Crawley District Scouts is concerned about a gift that has been given or offered which may represent a possible breach of these rules they should approach their manager or the District Lead Volunteer who will treat any such information in confidence.

5.2 Volunteers should also consult their manager if they have any questions – however minor - about the interpretation and application of this policy

**4. Approval and Review**

This Anti-Corruption and Bribery Policy Statement was prepared by the Trustees to provide a framework for volunteers to follow. It will be reviewed on an annual basis to ensure continuing appropriateness.

Approved by the Trustee Board: Signed

(District Lead Volunteer)

Dated: 29th May 2024