

Conflict of Interest Policy

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1 Introduction

- 1.1 Haringey Council is committed to the highest standards of integrity, transparency and accountability. A conflict of interest, whether actual, potential or perceived can undermine trust, damage the Council's reputation and compromise effective decision making.
- 1.2 The purpose of this policy is to protect the Council and its employees from conflicts of interest and allegations of misconduct. It provides a clear and consistent process for declaring, recording and managing conflicts of interest. Additionally, it ensures compliance with the Seven Principles of Public Life: Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership.
- 1.3 This policy should be read in conjunction with the following:
 - Code of Conduct Policy
 - Disciplinary Policy
 - Whistleblowing Policy
 - Anti-fraud, Bribery and Corruption Policy and Strategy (which includes gifts & hospitality)
- 1.4 This policy applies to all employees, agency workers and contractors working within the Council. Teachers and employees working in schools have their own local management and policies to follow.
- 1.5 Failure to declare or appropriately manage a conflict of interest may result in:
 - Disciplinary action, which may include dismissal.
 - Potential legal consequences.

2 Principles

- 2.1 Employees must openly disclose any actual, potential or perceived conflicts of interest as early as possible, ideally before entering any relevant arrangements.
- 2.2 Declarations of a conflict of interest should be handled sensitively and only shared with those who need to know to manage the conflict appropriately.
- 2.3 All decisions and actions must be made in the best interests of the Council, free from personal bias or undue influence.
- 2.4 Employees are responsible for identifying and managing conflicts of interest and for cooperating with any measures put in place to resolve them.
- 2.5 Processes for managing conflicts should be consistent, impartial and applied equally to all employees, regardless of role or seniority.

- 2.6 The Council should take proactive steps to identify and mitigate risks of conflicts of interest through clear policies & procedures and regular reviews.
- 2.7 All employees must comply with relevant laws, regulations and internal policies related to conflicts of interest.

3 Definition of Conflict of Interest

- 3.1 A conflict of interest occurs when an employee's private interests could improperly influence or appear to influence their ability to perform their official duties objectively and in the best interest of the Council.
- 3.2 The following are examples of conflict of interests; it is not an exhaustive list.
- An employee having an additional job that overlaps with their official duties, working hours or could impact their ability to carry out their duties for the council.
 - Awarding a contract to a business owned by a family member, close friend or someone known to you which could lead others to question your judgement on the award.
 - An employee participating in recruitment or procurement decisions involving someone they have a personal relationship with.
 - Using confidential information gained through their job for personal gain.
 - Personal relationships in the workplace
Accepting Gifts or hospitality (these must be declared on [HALO](#)). Please refer to the HALO ticket and Anti-fraud, Bribery and Corruption Policy and Strategy (which includes gifts & hospitality)

Further examples can be found at Appendix A.

- 3.3 Conflicts of interest can be classified as:
- Actual - where a real conflict exists.
 - Perceived – where there is the potential for a conflict to exist or it could appear that a conflict exists, even if it does not.
 - Potential - where a conflict could arise in the future.

4 Declarations of Interests

- 4.1 All employees must adhere to the following:
- Declare any actual, perceived or potential conflict of interests as soon as it arises.
 - Complete a [Declaration of Interest](#) on HALO. Where possible, conflicts of interest should be identified, declared and approved prior to entering into any relevant arrangements or commitments.

- Update declarations if circumstances change during the course of employment.

- 4.2 As part of the pre-employment checks, all new employees are required to provide details of any potential Conflict of Interests. If a conflict of interest is disclosed, the Onboarding and Compliance Team will notify the recruiting manager so that the procedure outlined in Section 5.1 can be followed and the details will be recorded in the Register of Conflicts of Interest. New employees should declare any personal relationships with other employees of Haringey council, contractors or councillors.
- 4.3 Agency workers and contractors are required to complete a Declaration of Conflict of Interest as part of the application process. Recruiting Managers must review the application documents submitted via the Matrix system for potential agency workers. If a preferred candidate has declared a conflict of interest, Matrix will notify the recruiting manager and the [HR Matrix Contract Team](#). The recruiting manager must discuss the declaration with their Head of Service and an informal discussion should take place between the worker, the line manager and Head of Service. If the declaration raises concerns, the recruiting manager must discuss with the Senior Employee Relations Specialist before a decision is made regarding the offer of a contract. Information on declared conflicts of interest by agency workers can be accessed through reports generated by Matrix.
- 4.4 Employees should provide any potential declarations of interest as they arise and reminder communications are issued. Employees on Senior Manager terms and conditions will be required to complete a new Declaration of Conflict of Interest form every two years. Any declared interests are recorded in the Conflicts of Interest register.

5 Managing Conflicts of Interest

- 5.1 Once a conflict of interest has been declared by:
- a new starter, the recruiting manager will be informed by the Onboarding & Compliance team
 - an employee, the employee's manager will receive a notification for approval on HALO

The recruiting /employee's manager may wish to consult with Employee Relations Team in the first instance. The employee's manager will review, approve or decline, the Conflicts of interest will also be recorded in the Conflicts of Interest register.

6 Identifying a Conflict of Interest

- 6.1 Informal Resolution
- 6.1.2 If an actual or potential conflict of interest arises, employees must inform their manager immediately and add to HALO, [Declaration of Interest](#). Reasonable steps

must be taken to prevent or mitigate the conflict, which may include resigning from external positions or ceasing conflicting activities. The manager will review the conflict, liaise with the Employee Relations Team in the event there are concerns and then confirm the outcome (approval/ otherwise) on HALO.

- 6.1.2 If unresolved, a meeting may be held to agree on next steps. Temporary measures including restrictions on outside work may apply until a resolution is reached.

6.2 Formal Resolution

- 6.2.1 If an employee or associated person gains an improper advantage, the matter will be fully investigated as a potential disciplinary offence, in line with the Council's Disciplinary policy, and where relevant, the Anti-Fraud and Corruption Policy and the Code of Conduct policy.
- 6.2.2 In the event the situation involves an agency worker the [HR Matrix Contract Team](#) must be informed before a contract is ended. It may be necessary for HR to inform the agency worker's agency of the conflict.

7 Ongoing monitoring

- 7.1 On a quarterly basis, the conflict of interest register will be reviewed by the Employee Relations Team. Where necessary, conflicts will be investigated as appropriate.
- 7.2 Conflicts of interest will be reported to Statutory Officers Group at least annually.

8 Confidentiality

- 8.1 All information will remain confidential. Access to the Register will only be granted with the Chief People Officer's approval and only where a legitimate, lawful reason exists.

9 Penalties for Non-Disclosure

- 9.1 The Bribery Act 2010 makes it an offence to offer or accept advantages related to Council business. The Local Government Act 1972 (section 117) requires employees to declare any financial interests in Council contracts.
- 9.2 Breaches of these laws may result in criminal prosecution.

10 Further References

Code of Conduct Policy
Disciplinary Policy
Whistleblowing Policy
Anti-fraud, Bribery and Corruption Policy and Strategy (which includes gifts & hospitality)

Appendix A - Examples of Conflict of Interest

The following are examples of situations that may cause actual or potential conflict of interest, this list is not exhaustive:

- An employee involved in reviewing and approving grant applications for local voluntary groups must declare a conflict of interest if they also hold a financial or decision-making role, such as Treasurer, in a Haringey-based group applying for a council grant. In such cases, the employee must inform their line manager and complete [Declaration of Interest Form](#).

If the voluntary organisation is based outside Haringey, no conflict arises, as grant applications are managed by a different authority.

- If an agency worker is responsible for processing invoice payments and also works for a local company providing services to the council, a conflict of interest arises if they are required to authorise payments to that company. This must be declared immediately.
- If an employee's spouse is elected Chair of Governors at a Haringey maintained school and the employee works in Haringey's Governing Body team, this must be declared to their line manager and a [Declaration of Interest](#) completed. If the school is outside Haringey or is an Academy, no declaration is required as there is no conflict.
- If a family member of an employee joins the council, either as an employee or agency worker, and is placed in a team managed by the employee, this creates a conflict of interest. The employee must notify their manager and complete a Declaration of Interest form. They must not be involved in the family member's recruitment, appraisal, or any employment-related decisions. The manager may choose to reassign the worker to another team or end their contract.
- When a close personal relationship develops between a manager and an employee (or between any other manager and an employee) the senior manager must assess the situation. This includes considering alternative line management arrangements and evaluating any potential operational challenges that may arise, along with strategies for effectively managing them.
- If an employee requests to undertake additional work on two evenings per week, the request may be considered, provided that the combined total hours worked across both roles does not exceed 48 hours per.
- An employee is contracted to work 30 hours per week for Haringey Council and it is identified that they are also contracted to work 20 hours per week at another council. This would lead to an investigation which could be carried out under section 9 of the disciplinary policy and a referral made to the fraud team.

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