

Conflict of Interest Policy

01/08/2025

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Title:	Conflict of Interest Policy
Author:	Policy Assistant
Applicability:	All organisation

This policy will be reviewed once a year at a minimum.

Conflict of Interest Policy

Introduction

Consortium24 is committed to good governance and alignment with our organisation's mission and strategic direction to be the best provider of consultancy support in the health and social care sector.

This policy has been drafted to ensure that all those who work for, with or on behalf of Consortium24 Limited Liability Partnership (C24) have guidance on the following:

- Common principles and rules for managing conflicts of interest;
- Advice about what to do in common situations;
- How interests should be approached and managed; and
- Issues and rationale behind the policy.

Policy Statement

At Consortium24 we recognise there are those who hold a position of responsibility in the work that C24 undertakes and as a representative, subcontractor or associate who acts on behalf of C24, has a duty to act in its best interests.

We believe in integrity and public service. We are parents, carers, partners and citizens and we strive to ensure that what we enable in our professional roles reflects what we would seek to receive and experience in our own personal lives.

Conflicts of interest are common in consultancy work and amongst those who have 'portfolio careers' – for example where project work with clients occurs for part of the week and other roles including teaching commitments or broader work across the sector occurs for the remainder.

Having a conflict does not mean a person has done something wrong, however, there needs to be supportive action to prevent this from interfering with the ability to decide in the best interests of C24, if applicable, or else to ensure reputational damage does not occur. This will ensure proper transparency and eliminate potential hidden bias.

Key Terms

A '**conflict of interest**' is:

"A set of circumstances by which a reasonable person would consider that an individual's ability to apply judgement or act, in the context of acting on behalf of C24 or could be, impaired or influenced by another interest they hold."

A conflict of interest may be:

- Actual - there is a material conflict between one or more interests
- Potential – there is the possibility of a material conflict between one or more interests in the future

A '**declaration of interest**' is:

- All interests including financial, professional, personal and indirect interests. It is through declaring your interests that you and others can assess if there are any conflicts.

Our Responsibilities

Consortium24 Ltd is a small enterprise that undertakes to provide consultancy support to clients in the health and care sector.

We believe in integrity, transparency and taking action to declare conflicts of interest. Our key activities include:

- Desktop analyses of data, processes, policies and procedures.
- Engagement with stakeholders through various platforms and using various tools (interviews, surveys, focus groups etc.)
- Seeking out and paying regard to the views of those with lived experience
- Provision of workshops and meetings.

- Developments of presentations and reports.
- Attendance at meetings, site visits etc.

In undertaking our business operation, we work in partnership with a wide range of stakeholders. The aim of this policy is to protect both the organisation and the individuals involved from any act or appearance of impropriety and to give guidance to Managing Partners, sub-contractors and associates and other interested parties on the steps to take to avoid conflicts of interest and how to manage them if they occur.

These may arise where an individual's business, personal or family interests and /or loyalties conflict with those of C24. Such conflicts may create problems; they can

- Inhibit free discussion
- Result in decisions or actions that are not in the best interest of C24 and clients we support
- Give the impression that C24 has acted improperly
- Seriously harm the organisation's reputation

Managing Partners are responsible for ensuring this policy is complied with throughout and across the organisation, including their own personal compliance.

Managing Partners are responsible for reporting any identified or potential conflicts of interest to our nominated Managing Partner, Alex Robertson (alex@consortium24.co.uk)

Declaration of Interests

Managing Partners, employees, sub-contractors or associates should identify and declare material interests at the earliest opportunity (and in any event within 28 days). Where there is any doubt as to whether an interest is material then they should declare it, so that it can be considered.

A Declaration of Interests record will be held by C24 Board, listing the types of interest declared.

To be effective this declaration of interests will be updated annually, normally after each Board, and when any changes occur. As a standard agenda item C24 Board are asked to declare any conflict of interests. C24 Managing Partners should keep their independence and report into the Board if they feel influenced by any interest or may be perceived as being influenced or to having a conflict.

All decisions involving a conflict of interest will be reported in the minutes to include the nature and extent of the conflict, an outline of the discussion, and the actions taken to manage the conflict.

The register of interest should also be used to declare any gifts of a value over £10 received by C24 Managing Partners, employees, sub-contractors or associates. Gifts should be recorded as soon as possible and no later than one month after receipt.

Governance and Management (including of Sub-Contractors and Associates)

All Managing Partners receiving information on actual or potential conflicts of interest must ensure that any potential conflicts not causing a significant risk to C24 are appropriately recorded, monitored, and managed.

Managing Partners are required to maintain knowledge of this policy and any procedures in place for managing potential conflicts. Conflicts, or potential conflicts that may pose a significant risk to C24, must be escalated in confidence to the C24 Board to raise awareness and ensure appropriate action can be taken to minimise any risks and where possible resolve the issue.

In line with their contractual agreements, and as part of onboarding, we expect our sub-contractors, employees and associates :

- to read and abide by the contents of this policy.
- to adhere to any contractual arrangement with C24 in relation to conflicts of interest
- to declare any relevant conflicts to Managing Partner
- to inform Managing Partners when an incident of, or a significant risk incident of a conflict of interest that may adversely affect C24, has been identified

The Associate or Subcontractor shall at all times fully comply with any policies of C24 in relation to conflicts of interest. notified or made available to it. In particular but without limitation it shall notify C24 of any potential conflicts of interest. During the Contract Period, the Associate shall not whether personally or by an agent, employee or otherwise either on its own account or for any other person, firm or company provide services to or deal with any person, firm or company if to do so would involve it in any conflict with the interests of C24.

If a material interest is declared but there is no risk of a material conflict arising, then no action is warranted. However, if a material interest is declared then the Managing Partner actions that could be applied include:

- restricting applicable personnel involvement in associated discussions and excluding them from decision making
- removing applicable personnel from the whole decision-making process • removing applicable personnel responsibility for an entire area of work
- removing applicable personnel from their role altogether if they are unable to operate effectively in it because the conflict is so significant

Each case will be different and context-specific, and the C24 Board will always clarify the circumstances and issues with the individuals involved.

Conclusion

At Consortium24 integrity is at the heart of what we do and delivered in line with our policies.

Managing Partners ensure the assurance process is in place and well managed - including compliance with relevant conflict of interest guidance, regular monitoring and declarations made.

This policy reflects our commitment to good governance as an organisation, for and with our clients, employees, sub-contractors and associates.

Julie Haywood, Tracey Callaghan-Hayes, Alex Robertson

Managing Partners,

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