

CONFLICT OF INTEREST POLICY

Principles

1. When representing OBS, trustees, facilitators and volunteers shall not promote their personal opinions or interests outside of the scope of OBS' work.
2. When using OBS services, in person and online, families deserve a safe space free of commercial advertising and influence.

Scope of policy

This policy applies to trustees, facilitators and volunteers.

Why we have a policy

Trustees have a legal obligation, and facilitators and volunteers an ethical obligation, to act in the best interests of OBS and in accordance with OBS's Constitution, and to avoid situations where there may be a potential conflict of interest.

Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of OBS. Such conflicts may create problems; they can:

- inhibit free discussion
- result in decisions or actions that are not in the interests of OBS
- risk the impression that OBS has acted improperly.

The aim of this policy is to protect both OBS and the individuals involved from any appearance of impropriety.

Accordingly, we are asking trustees and facilitators to declare their interests, and any gifts or hospitality offered and received in connection with their role in OBS, to the Chair of Trustees annually.

Examples of conflicts of interest

- You or your partner work for the Clinical Commissioning Group

- You run a baby sleep coaching or breast pump hire business
- Your partner has a financial interest in or is a trustee of a potential Drop-In venue
- You undertake privately paid for lactation consultancy in the Oxford area

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the Chair of Trustees for confidential guidance.

Interests and gifts will be recorded on the charity's register of interests, which will be maintained by the Chair of Trustees. The register will be accessible by all trustees and facilitators.

Data Protection

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998 and GDPR. Data will be processed only to ensure that trustees, facilitators and volunteers act in the best interests of OBS. The information provided will not be used for any other purpose.

What to do if you face a conflict of interest

If you believe you have a perceived or real conflict of interest you should:

- declare the interest at the earliest opportunity
- withdraw from discussions and decisions relating to the conflict.

The Chair of Trustees should take special care to ensure that minutes or other documents relating to the item presenting a conflict are appropriately redacted for the person facing the conflict. A balance needs to be made to ensure that the person still receives sufficient information about the activities of the charity generally without disclosing such sensitive information that could place the individual in an untenable position.

If you fail to declare an interest that is known to the Chair of Trustees, the Chair of Trustees will declare that interest.

Decisions taken where a trustee or facilitator has an interest

In the event of the management committee having to decide upon a question in which a trustee, facilitator or volunteer has an interest, all decisions will be made by vote, with a simple majority required. A quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate. Interested management committee members may not vote on matters affecting their own interests

All decisions under a conflict of interest will be recorded by the Chair of Trustees and reported in the minutes of the meeting. The report will record:

- the nature and extent of the conflict
- an outline of the discussion
- the actions taken to manage the conflict.

Where a trustee benefits from the decision, this will be reported in the annual report and accounts.

All payments or benefits in kind to trustees & facilitators will be reported in the charity's accounts and annual report, with amounts for each trustee/facilitators listed for the year in question.

Where a trustee, facilitator or volunteer is connected to a party involved in the supply of a service or product to the charity, this information will be fully disclosed in the annual report and accounts.

Facilitators

Facilitators may be engaged in paid professions and businesses which offer products or services of value to families. Facilitators shall make all efforts to separate their roles as facilitators from their business roles.

OBS facilitators shall not seek to profit financially from families through their interactions with them as OBS facilitators, nor will facilitators promote the financial interests of their family members, friends and colleagues, including other OBS facilitators.

A facilitator who is also a businessperson shall offer a range of choices to families who require a product or service that she or another OBS facilitator might supply in a business capacity. For example, if a family wishes to employ a private IBCLC, facilitators will refer them to the LCGB website where the family can find comprehensive listings of practitioners.

When representing OBS, a facilitator will never refer families directly either to herself or to another OBS facilitator in their business capacity. If a facilitator is approached about a private lactation consultancy visit within an OBS Drop-In or online forum, they will clarify with the family that they cannot undertake business discussion in that context and they will refer them to the LCGB website.

Use of OBS platforms to promote commercial organisations

- OBS platforms (including but not limited to Drop-Ins, website, Facebook & Twitter) shall not be used to advertise or endorse any commercial services (including promotion of free services which are part of a commercial business) except in the case that an arrangement has been made between that service and OBS for the direct financial or in-kind benefit of OBS, e.g. sponsorship.
- When advising families about commercial services which might be of relevance to them (e.g. tongue-tie practitioners, pump hire), OBS facilitators will provide

evidence-based, impartial advice and a range of options based on the needs of the family, free from any commercial considerations.

Date of policy: July 2018
Date for review: July 2020