

CONFLICT OF INTEREST POLICY

October 2018

1 DEFINITIONS

FYA defines conflict of interest in the broadest sense. This includes the following:

1. pecuniary interest;
2. non-pecuniary benefit or interest;
3. a perception of any of the above; and
4. Directors' responsibilities.

Pecuniary benefit

Where a Board or committee member or a member of staff might reasonably be expected to benefit financially.

Pecuniary interest

Where a proximate person of a Board or committee member or a member of staff might reasonably be expected to benefit financially.

Non-pecuniary benefit

Where a Board or committee member or a member of staff might reasonably be expected to benefit in some way e.g. if a Board member also is on a Committee of Management of an applicant and the applicant is successful in obtaining a grant from FYA, then the Board member has received a non-pecuniary benefit.

Non-pecuniary interest

Where a proximate person to a Board or committee member or a member of staff might reasonably be expected to benefit in some way e.g. if a Board member's spouse is also on a Committee of Management of an applicant and the applicant is successful in obtaining a grant from FYA, then a proximate person to the Board member has received a non-pecuniary benefit.

Directors' responsibilities

Directors of FYA have responsibility for the good governance of the organisation. They direct FYA's relationships with many other entities including financial and strategic. Conflict of interest issues may arise whilst fulfilling these responsibilities e.g. a Director may also be a Board member of a financial institution that manages part of FYA's corpus.

Proximate person

This includes close relatives, partners, close personal friends.

Proximate organisation

Any organisation/group in which the Board, Committee or staff person (or proximate person to the same) has involvement as committee, staff or user with a strong loyalty.

2 PRINCIPLES

Transparency

The process for considering all grant applications, program participants and awarding work to suppliers to FYA should be as transparent as reasonably possible.

These processes should be of the nature that, if they were to occur in another organisation, we would not be critical.

Board, Committee and staff members need to feel that their positions are protected. That they will not be subject to allegations that they have behaved improperly in order to secure funding for their own organisations or for initiatives operated by family or friends, and further that they will not be pressed to join organisations because of their involvement is seen as the means to access FYA funding.

Equity of access to opportunity

Opportunity to apply and/or develop relationships with all entities and people are welcomed by FYA. Applications and relationships should not be precluded because of an individual's commitment to volunteer or work for FYA.

Good governance

Good governance requires performance, fairness, transparency, accountability and appropriate disclosure.

All decisions made by or on behalf of FYA should be seen to be made within an ethical framework, keeping in mind the legal responsibilities of Directors and the values of the organisation.

All activities conducted by or on behalf of FYA should be and seen to be undertaken within an ethical framework, keeping in mind the legal responsibilities of Directors and the values of the organisation.

Disclosure in the case of uncertainty

In circumstances or potential circumstances of conflict of interest Board, Committee and staff members should err on the side of caution. That is, in cases of doubt should always be resolved by disclosure.

All actions to resolve conflict of interest issues should be based on the principle of disclosure in the case of uncertainty.

Pecuniary Benefit and/or Interest to self or proximate person/organisation

Disclosure to a Committee Chair and key staff contact. Key staff contact will notify Chief Executive Officer or Company Secretary. Chief Executive Officer/Company Secretary will notify the Chair.

Staff member will notify Team Manager. Team Manager will notify Company Secretary. Company Secretary will notify the Chair.

The Board, Committee or staff member should play no part in consideration by FYA.

Non-pecuniary benefit and/or interest

Disclosure to a Committee Chair and key staff contact. Key staff contact will notify Chief Executive Officer or Company Secretary. Chief Executive Officer/Company Secretary will notify Chair.

Staff member will notify Team Manager. Team Manager will notify Company Secretary. Company Secretary will notify Chair.

The Board, Committee or staff member should play no part in consideration by FYA.

Non-pecuniary benefit and/or interest to a proximate person

Disclosure to Committee Chair and key staff contact. Key staff contact will notify Chief Executive Officer or Company Secretary. Chief Executive Officer/ Company Secretary will notify Chair at their discretion.

As each situation is likely to be very different; each Committee will determine on a case by case basis the resolutions of this situation.

Directors

Directors are required to disclose on a continual basis, in writing any position (voluntary or paid) they hold that may result in a conflict of interest issue.

3 SCOPE

This policy applies to all activities and decisions by FYA and must be followed by all Directors, committee members, employees and volunteers.

4 BREACHES OF POLICY

All employees and volunteers must comply with this policy. Any breach of this policy will be treated as a serious matter and may result in disciplinary action including termination of employment.

Other disciplinary action that may be taken including, but is not limited to, issuing a formal warning, directing people to attend mandatory training or suspension from the workplace.

5 VARIATIONS TO THIS POLICY

FYA reserves the right to amend and vary this policy in line with best practice, operating efficiency and changes to legislation.

6 MONITORING AND REVIEW

This policy will be monitored on an ongoing basis by the CEO, the Senior Leadership Team and The Board (where applicable). It will be formally reviewed every two years, or earlier if required, to ensure compliance with legislation and FYA operating procedures.

Authorised By	Date Authorised	Date of Effect	Review Date
Board of Directors	2 October 2018	3 October 2018	October 2020