Publish What You Pay
Conflict of Interest Policy

Introduction

Publish What You Pay (PWYP) recognises that the nature of its work, and the eligibility criteria for Board membership, may bring about potential conflicts of interest for its trustees. There may also be situations where staff and volunteers find themselves in a situation where there is a conflict of interest between the work they are required to do at PWYP and other personal or professional interests they may have.

All staff, volunteers, and trustees and Global Council members of PWYP should strive to avoid any conflict of interest between the interests of PWYP on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

The purpose of this policy is to:

- protect the integrity of PWYP's decision-making processes;
- enable stakeholders to have confidence in the organisation's integrity;
- protect the integrity and reputation of staff, volunteers and trustees;
- ensure that PWYP maintains its charitable status.

Examples of conflicts of interest include:

1. A trustee or GC member who is also a service user (via coalition membership for example) may be faced with a decision in a Board or GC meeting regarding whether financial support to a particular region or national coalition should be increased.
2. A trustee or GC member who is related1 to a member of staff and there is decision to be taken on staff pay and/or conditions at a Board or GC meeting.
3. A trustee or GC member who is also on the Board of another organisation that is competing for the same funding.
4. A trustee, GC member, staff member or volunteer who has shares in a business that may be awarded a contract to do work or provide services for PWYP or is a director, partner or employee or related to someone who is.1
5. A trustee or GC member who has a relationship with an extractive company (for example is a direct shareholder or sits on a Board of an extractive company).

Process for dealing with potential Conflicts of Interest

Upon appointment to their position at PWYP, all staff members, volunteers, Global Council members and trustees will make a full, written disclosure of interests, such as relationships, and posts held, that could potentially result in a conflict of interest. This written disclosure will be kept on file and will be updated annually or as appropriate.

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1 A relative may be a child, parent, grandchild, grandparent, brother, sister, spouse or civil partner of the staff member, volunteer or trustee – or any person living with them as his or her partner.
In the course of meetings or activities, staff members, volunteers, Global Assembly members and trustees will disclose any interests in a transaction or decision where there may be a conflict between PWYP’s best interests and that person’s best interests or a conflict between the best interests of the two organisations with which the person is involved with. If in doubt the potential conflict must be declared anyway and clarification sought.

In the case of staff and volunteers, the conflict of interest must be disclosed to their supervisor.

In the case of a conflict of interests arising for a trustee or Global Council member because of a duty of loyalty owed to another organisation or person and the conflict is not authorised by virtue of any other provision in the articles of association, the unconflicted trustees or Global Council members may authorise such a conflict of interests where the following conditions apply:

1. The Charity Commission’s permission is sought before a benefit for a trustee may be authorised that isn’t otherwise authorised in the Articles or already authorised in writing from the Commission.

2. The trustee or Global Council member who has declared the conflict of interest withdraws from the part of the meeting at which there is discussion of any arrangement or transaction affecting that other organisation or person;

3. The trustee or Global Council member who has the conflict of interest does not vote on any such matter and is not to be counted when considering whether a quorum of Board members is present for that portion of the meeting;

4. The other trustees or Global Council members who have no conflict of interest in this matter consider it is in the interests of PWYP to authorise the conflict of interest in the circumstances applying.

5. Any such disclosure and the subsequent actions taken will be noted in the minutes.

For all other potential conflicts of interest the advice of the Charity Commission will be sought and the advice recorded in the minutes. All steps taken to follow the advice will be recorded.

Trustees and Global Council members are reminded that, apart from limited and exceptional circumstances listed in PWYP’s Articles of Association, no trustee or Global Council member may:

- Sell goods, services or any interest in land to PWYP;
- Be employed by, or receive any remuneration from, PWYP; or
- Receive any other financial benefit from PWYP.

This policy is meant to supplement good judgment, and staff, volunteers, Global Council members and trustees should respect its spirit as well as its wording.

Date Adopted: ______________________