



Conflict of Interest Policy

National Back Exchange

Responsible Person

Sarah Thornton, Chair

Authors

Kerry Kemp, Vice Chair

Mary Muir, Publications Director

Contents

1. Version Control Summary	3
2. Introduction	4
3. Purpose and Scope.....	4
4. Definition	4
5. Procedure.....	4
6. Data Protection	5
7. Audit – Monitoring Process	5
8. Appendix A: Declaration of Interest Form.....	6

1. Version Control Summary

Date	Version no.	Summary of changes	Consulting group/person
January 2017	1	Document drafted & circulated to Executive Committee & Admin team for consultation	NBE Executive Vice Chair
20-01-2017	1.0	Adopted	NBE Executive Vice Chair
July 2018	1.1	Minor format changes and addition of declaration of personal interest form as appendix	NBE Executive Vice Chair
May 2020	1.2	Reviewed – no changes	NBE Executive Vice Chair
October 2020	1.3	Removal of NBE address	NBE Executive Vice Chair
November 2021	1.4	Reference to Executive Committee changed to Board of Directors	Executive Committee Vice Chair
March 2025	2.0	Reviewed and updated previous conflict of interest policy to support NBE as a Charitable Incorporated Organisation, which came into force 29th March 2023.	S Thornton, Chair K Kemp, Vice Chair M Muir, Publications Director

2. Introduction

The National Back Exchange (NBE) is committed to ensuring its decisions and decision-making processes are free from personal and organisational bias and do not unfairly favour any individual or organisation connected with NBE.

3. Purpose and Scope

This policy applies to all members of the NBE Board of Trustees, as well as those members engaged in activities in sub-committees, groups or organisations on behalf of the association. Collectively, these individuals are referred to as Board members in this document.

4. Definition

A conflict of interest occurs when a member of the NBE Board of Trustees has multiple interests, financial or otherwise, that could compromise their ability to act in the best interests of the organisation. This typically arises when personal interests may negatively impact their duty to make decisions for the benefit of the organisation or a third party. It also occurs when a member stands to gain personally from actions or decisions made in their official capacity. Such conflicts may affect the Board member directly or indirectly through a family member, friend, or business partner.

Examples of conflicts of interest include, but are not limited to,

- A Board member owns, is a shareholder of, or is employed in a position of influence within an organisation that may benefit from decisions made by the Board of Trustees in relation to work the association is requesting tenders
- A Board member owns, is a shareholder, or is employed in a position of influence within an organisation that may benefit from advice provided in response to a request for recommendations for support, education or participation in reputation enhancing projects
- A conflict of loyalty may exist, or be perceived to exist, such as where a Board member has duties to more than one organisation where both may be in competition for a contract or funding, such as when bidding for educational provision opportunities.
- An external individual or party engaged to perform work on behalf of the NBE has interests, obligations, or affiliations that could compromise, or appear to compromise, their ability to act in alignment with the NBE's objectives. This includes situations where their work, decisions, or relationships may create a risk of bias, unfair advantage, or a conflict with the NBE's mission and strategic goals'

In some instances, an ongoing conflict may affect a Board member's ability to participate in decision-making processes so significantly that it becomes impractical for that member to continue to vote on a particular issue in their role, or to accept a nomination for the position of Board member when approached.

5. Procedure

When a Board member identifies a potential conflict of interest they must:

- Declare the conflict of interest as soon as they become aware of it
- Ensure so significantly that it becomes impractical for that member to continue in their role, or to accept a nomination for the position of Board of Trustees member when approached.
- Abstain from participating in any Board of Trustees discussions related to the conflict.
- Refrain from taking part in any decision-making related to the conflict.
- Not be counted in the quorum for decision making related to the conflict of interest.

To facilitate open and candid discussion, a Board member affected by a conflict of interest must leave the room when discussions or decision-making on the matter are taking place unless there is a valid reason for them to remain.

The minutes should document:

- The declared conflict of interest
- Whether the Board member left the room or the reason they were asked to stay.
- That the Board member did not engage in any discussion or decision making regarding the matter
- That the Board of Trustees meeting was quorate (excluding the affected Board members)
- Any additional actions taken to address the conflict.

If a Board member is uncertain about what to declare, they should err on the side of caution and discuss the matter with Chair or Vice Chair for confidential guidance.

6. Data Protection

The information provided will be processed in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Data will be processed solely to ensure that the Board of Trustees and the Association's Administration team act in the best interests of NBE. The information provided will not be used for any other purpose.

7. Audit – Monitoring Process

Monitoring process	Requirements
Who	<ul style="list-style-type: none"> • National Back Exchange Board of Trustees
How	<ul style="list-style-type: none"> • The Board of Trustees will review the policy annually. • An early reviewed may be warranted if one or more of the following occurs: <ul style="list-style-type: none"> - As a result of regulatory / statutory changes or developments - As a result of NBE policy changes or developments
Presented to	<ul style="list-style-type: none"> • Board of Trustees
Monitored by	<ul style="list-style-type: none"> • Procedural document review group <ul style="list-style-type: none"> - Sarah Thornton, Chair - Kerry Kemp, Vice Chair - Mary Muir, Publications Director • National Back Exchange Board of Trustees
Completion / Exception report to	<ul style="list-style-type: none"> • Extraordinary circumstances beyond the control of National Back Exchange.



Declaration of Interest Form: For Board of Trustees

National Back Exchange

The Declaration of Interest form is required to identify any potential conflicts between your personal, financial, or professional interests and your responsibilities as a Board member. Completing it ensures transparency and helps maintain the integrity of the Board's decisions. All disclosed information will be treated confidentially and will only be used to manage potential conflicts.

Please complete the form to the best of your knowledge and return to secretary@nationalbackexchange.org

1. Board of Trustee Member	
Name of Trustee:	
Position on the Board:	
Date:	
2. Declaration of interests	
<p>Please list any personal, financial, or professional interests that could potentially conflict with your responsibilities as a member of the National Back Exchange (NBE) Board of Trustees. This may include:</p> <ul style="list-style-type: none"> Financial investments, partnerships, or ownership in companies related to moving and handling or health and care services. Roles in other organisations (paid or voluntary) that may affect your ability to impartially represent NBE. Any close relationships (family, friends, etc.) with individuals or organisations that may influence your decision-making. 	
<p>If you have no conflicts to declare, please state either:</p> <p>"None" and go to section 4</p> <p>"To declare" and go to section 3</p>	To declare
3. Description of interest	
Description of interest:	
<p>Is there potential for conflict, please state either:</p> <p>"Yes" and complete box below</p> <p>"No" and go to section 4</p>	
<p>Steps to manage or resolve (if applicable):</p> <p>As an employee of a commercial company, I would withdraw from any discussions, voting or activities where necessary to avoid potential conflicts of interest.</p>	
4. Confirmation	
<ul style="list-style-type: none"> I confirm that the information provided above is accurate to the best of my knowledge. I understand that I am required to update this form promptly if any new conflicts arise during my time on the Board and alert the Chair of the Board. 	
Signature:	Date:

Office Use Only	
Conflict of interest identified "Yes" or "No" :	
Actions taken to manage conflict:	
Reviewed by:	
Name:	
Position on Board	
Signature:	
Date:	