



Conflict of Interest Policy - Employees

1. Introduction

The Bikeability Trust exists to advance the education of the public in general (and particularly children) on the subject of cycling and the National Standards for Cycling. The Trust exists to strengthen Bikeability, promote its benefits and maximise its impact. The Trust is responsible for the development of the core offer for children and adults under the UK Government Walking and Cycling plan Gear Change: a bold vision for walking and cycling.

The Trust reserves the right to protect its strategic and financial interests, and the integrity, impartiality and independence of its activities and works.

2. Risks associated with conflicts of interest

a) Full transparency about and management of (potential) conflicts of interest, are crucial to the credibility of the Trust.

b) A material conflict of interest is one which, in view of all the circumstances, could reasonably be expected to:

- affect the independence or impartiality of the person with the interest;
- pose a real or perceived risk through association to the integrity of the Trust;
- pose a risk to the strategic, reputational and financial viability of the Trust.

c) Material conflicts of interests of individuals related to the staff member or the Trust could lead to:

- biases in development, monitoring, programme offering or provider commercial access;
- biases in the publication of promotion or communications;
- misuse of privileged and/or confidential knowledge;
- misuse of strategic management information;
- risk to the real or perceived integrity, impartiality, independence and reputation of the Trust and its works.

d) Any person with access to privileged strategic and/or financial information, including Providers, Grant recipients, cycling industry members, Instructors, stakeholders, staff, contractors and volunteers shall have no direct or indirect financial, economic or other personal interest which might be perceived to compromise the integrity of the universal offer and the Trust, in any and all actions taken by them on behalf of or for the Trust in their respective capacities.

3. Potential conflicts of interest include but are not limited to (without the written consent of the Trust):

a) in any way be directly or indirectly engaged or employed in, or concerned with (in any capacity whatsoever) or provide services to, any other business or organisation where this is, or is likely to be, in conflict with the interests of the Trust or where this may adversely affect the efficient discharge of your duties. However, this does not preclude your holding up to 5% of any class of securities in any company that is quoted on a recognised Stock Exchange.



- b) directly or indirectly receiving financial compensation or other favours from a company that is funded by the Trust or from a company that has itself a conflict of interest; financial compensation includes direct and indirect remuneration as well as gifts or favours;
- c) direct or indirect association with any business, organisation, group or individual whose interests and activities compete or conflict with the interests and activities of the Trust;
- d) having a close family member (e.g. spouse, parent, child or spouse of a child, brother, sister, or spouse of a brother or sister) or a partner who has direct or indirect association with any business, organisation, group or individual whose interests and activities compete or conflict with the interests and activities of the Trust;
- e) direct or indirect association with any business, organisation, group or individual whose interests and activities might potentially compromise the real or perceived integrity, independence, and impartiality of the Trust;
- f) any other interests that have been deemed potentially conflicting by the Board.

4. Management of potential conflicts of interest - Disclosure

Any person who has a potential interest or associations as defined under item 3 above, shall disclose such interest to the Chief Executive. It is the responsibility of that person to also inform the Chief Executive of any changes to previous declarations and to declare any future conflicts of interest.

Any declaration should be made using the section at the end of this document.

The Chief Executive shall evaluate all disclosed potential conflicts of interest and assess whether or not they are material conflicts of interest.

Any person who wishes to appeal the outcome of the Chief Executive's evaluation may do so in writing to the Chair of Trustees. The Chair may consult or appoint someone to act on their behalf (including the establishment of a sub-group), if necessary, before deciding upon the merits of the appeal. The decision of the Chair will be confirmed in writing and will be final.

5. Corrective actions

- a) Any material conflict of interest or any violation of the rules outlined in this Policy, which is not disclosed, and action agreed with their departmental Director, shall prompt disciplinary and/or corrective action by the Chief Executive. Action may include but is not limited to the termination of any current contractual arrangement whether in writing or orally;
- b) A charge of incompletely or inaccurately disclosed conflicts of interest shall be directed to the Chief Executive.
- c) The Chief Executive shall take no action until they have given the person charged with the alleged conflict of interest the opportunity to fully represent themselves;
- d) The Chief Executive may appoint a disinterested person or committee to investigate the alleged conflict of interest.



e) Any person who wishes to appeal the outcome of the Chief Executive's evaluation may do so in writing to the Chair of Trustees. The Chair may consult or appoint someone to act on their behalf (including the establishment of a sub-group), if necessary, before deciding upon the merits of the appeal. The decision of the Chair will be confirmed in writing and will be final.

6. Potential Conflict of Interest Declaration

To be completed and signed

I have reviewed and understood the Conflict of Interest Policy of the Bikeability Trust and agree to abide by it.

Employee Name: .

- I have no conflict of interest to declare.
- I have the following conflict of interest to declare:

1. _____
2. _____
3. _____

I hereby certify that the information set out above is true and complete to the best of my knowledge at the time of signing. I also confirm that I will update this information as soon as reasonably practicable should there be any changes to the information provided or any potentially new conflicts to declare

I further confirm I have read and will comply by the Bikeability Trust's:

- Terms and conditions of employment
- Data Protection Policy
- Staff Code of Conduct
- Health and Safety policy
- Anti-Bribery policy

Signature:

Role:

Date:

Signed Chief Executive:

Date:

Signed copies should be saved on Breathe



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Approved by (name)

John Jackson

Date of approval by the Board

09/01/2024

Last reviewed

N/A

Date of next review

January 2026

Provenance

Drafted by M Turnbull, Director of Operations
