

Cork County Public Participation Network (PPN) Conflict of Interest Policy (P9)

1. Purpose

The purpose of this policy is to assist PPN staff and volunteers engaging with the PPN to effectively identify, record and manage any conflicts of interest in order to protect the integrity of the PPN and to ensure that volunteers act in the best interest of the PPN.

2. Objective

The PPN Secretariat aims to ensure that all staff and volunteers engaged with the PPN (themselves included) are aware of their obligations to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of the PPN.

3. Scope

This policy applies to all PPN staff and volunteers. Member group representatives that participate in Plenary or other decision-making meetings should be reminded by the Chairperson or Facilitator of the need to consider whether they have any conflicts of interest and to declare these if they do.

4. Definition of conflicts of interests

A conflict of interest is any situation in which a individual's personal interests or loyalties could, or could be seen to, prevent the them from making a decision in the best interests of the PPN. This personal interest may be direct or indirect, and can include interests of a person connected to the individual. These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the charity and therefore must be managed accordingly.

More information about identifying and handling conflicts of interest can be found following the Record of Interest sheet (P9a) below.

5. Policy

This policy has been developed because conflicts of interest commonly arise, and do not need to present a problem to the PPN if they are openly and effectively managed. It is the policy of the PPN as well as a responsibility of its staff and volunteers, that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with their obligations to the PPN.

The PPN will manage conflicts of interest by requiring staff and volunteers to:

- avoid conflicts of interest where possible
- identify and record any conflicts of interest
- carefully manage any conflicts of interest
- follow this policy and respond to any breaches

5.1 Responsibility of the Secretariat

The Secretariat is responsible for:

- establishing a system for identifying, disclosing and managing conflicts of interest across the charity
- monitoring compliance with this policy
- reviewing this policy on an annual basis to ensure that the policy is operating effectively

The PPN staff and volunteers should ensure they are aware of their obligations in the management and control of the PPN which is set out in the PPN Constitution and other governance documentation.

5.2 Identification and disclosure of conflicts of interest

Once an actual, potential or perceived conflict of interest is identified, it must be entered into the PPN's Register of Interests, as well as being raised with the Secretariat. The Register of Interests will be maintained by the PPN Co-ordinator, and will record all information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it).

Confidentiality of disclosures

In order to support PPN staff members and volunteers to disclose their conflicts of interest, information disclosed will be kept confidential and only members of the Secretariat and the PPN Co-ordinator will have access to it.

Where an individual requires additional restrictions on information relating to a conflict of interest, the Secretariat will be asked to consider an alternative disclosure mechanism.

6. Action required for management of conflicts of interest

6.1 Conflicts of interest of Secretariat members

Once the conflict of interest has been appropriately disclosed, the Secretariat (excluding the member making a disclosure and any other conflicted persons) must decide whether or not a conflicted individual should:

- vote on the matter
- participate in any debate
- or be present in the room during the debate and the voting

In exceptional circumstances, such as where a conflict is very significant or likely to prevent an individual from regularly participating in discussions, it may be worth the Secretariat considering whether it is appropriate for the person with the relevant conflict to resign from their position.

6.2 What should be considered when deciding what action to take

In deciding what approach to take, the Secretariat will consider:

- whether the conflict needs to be avoided or simply documented
- whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
- alternative options to avoid the conflict
- the PPN's objects and resources, and
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, the PPN

The approval of any action requires the agreement of at least a majority of the Secretariat who are present (excluding any conflicted member) and voting (if applicable) at the meeting. All details regarding the conflict of interest, including the action arising, will be recorded in the minutes of the meeting and subsequently entered into the Register of Interests.

7. Compliance with this policy

Cork County PPN Register of Interests (P9a)

Name of Individual (Member Gp & role, if relevant)	Date of appointment	Description of interest	Has the Secretariat been notified of the interest? (incl. date notified)	Date of disclosure

Signed: _____ Date : _____

(to be signed by individual declaring the interest, separate sheets to be used for different individuals)

Date form approved by Plenary: _____ **23/04/2026** _____

Information about Conflicts of Interest and how to handle them

(adapted from the Charities Regulator, Managing Conflicts of Interest Guidance, 2018)

What is a conflict of interest?

A conflict of interest is any situation in which someone's personal interests or loyalties could, or could be seen to, prevent them making a decision in the best interests of the organisation. A personal interest may be direct or indirect, and can include the interests of someone connected to the person. *(See below for more on who a connected person is.)*

How can you identify a conflict of interest?

The Charities Regulator advises people to take the 'conflict-of-interest test', and ask themselves: "Would a reasonable person (who was aware of your personal interest) believe that you might be influenced by your personal interest when making a decision on behalf on the organisation?"

If the answer is 'yes', then you have a potential conflict of interest.

Types of conflict of interest

A conflict of interest exists when the interests of an organisation conflicts with:

- the interest of a person or organisation that appointed you to your role (an appointment conflict), or
- your own personal or business interest in relation to that matter (a personal conflict)

Who is a "connected person"?

The Charities Act 2009 explains what is meant by a 'personal connection'. Persons who may be classed as a 'connected person' in respect of an individual include:

- a parent, brother, sister, spouse, grandparent or grandchild of the individual, or a child of the spouse of the individual;
- any person the individual is in a partnership with;
- any person the individual is employed by under a contract of service;
- a body corporate if the individual has control of it, or if the individual and any of the above mentioned connected persons together have control over it.

Why managing conflicts of interest is important

Conflicts of interest do arise but they need not be a problem if they are managed appropriately.

Failing to effectively manage conflicts of interest can negatively impact on the organisation in terms of governance and associated reputational risk, where a conflict interferes with a person's actual or perceived ability to comply with his or her duty to act in the best interests of the organisation.

Handling conflicts of interest

There are three key stages in dealing with a conflict of interest:

1 - IDENTIFY

- ✓ Adopt a conflicts of interest policy
- ✓ Know what your governing document says about conflicts of interest
- ✓ Create and maintain a register of interests Include 'conflicts of interest' as an agenda item at the beginning of all meetings
- ✓ Declare any potential conflict of interest as soon as you become aware of it

2 - MANAGE

- ✓ Put clear procedures in place that state what should happen when a conflict of interest is identified
- ✓ Ensure that decisions are taken in the organisation's best interests
- ✓ Apply the conflict of interest policy in all situations where there is a conflict or potential conflict
- ✓ Decide if any person with a conflict of interest should be involved in any discussions or decisions about the situation
- ✓ Ask yourself: Would a reasonable person, who was aware of the individual's personal interest, believe that the individual might be influenced by that personal interest when making a decision on behalf on the organisation? If the answer is "yes", then there is a conflict of interest.
- ✓ Ensure that your organisation can still carry on its business and form a quorum, even if a number of individuals have to withdraw due to a conflict arising

3 - RECORD

- ✓ Document any conflicts of interest and how you and the other persons involved have managed them

Each organisation is responsible for developing policy and procedures to identify, manage and record conflicts of interest, and all individuals involved with the organisation have a duty to declare any conflict of interest.

For more information on handling conflicts of interest is available from: www.charitiesregulator.ie

And their *Managing Conflicts of Interest Guidance* includes

- a sample conflict of interest policy
- a sample Template Register of Interests
- several case studies

While specifically targeted at charities, this guidance conforms with best practice.

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