

NHBF CONFLICT OF INTEREST POLICY STATEMENT

THE PURPOSE OF THIS POLICY IS TO:

- highlight and illustrate potential situations where conflicts of interest may arise
- identify the principles that the NHBF will adopt in the management of conflicts of interest
- set out what actions should be taken by individuals who encounter conflicts of interest
- set out how we will manage identified conflicts of interest.

INTRODUCTION

The National Hair and Beauty Federation (NHBF), the UK trade association for hair salons, barbershops and beauty salons. Originally established in 1942, the National Hair & Beauty Federation (NHBF) is the UK's largest trade body for businesses working in the hair, beauty and barbering industries with over 5000 members.

The organisation focuses on running a successful hair and beauty business and provides specialist support, tailored services and advice to meet the unique challenges of running a salon.

Individuals should always disclose an activity if they are in doubt about whether it represents a conflict of interest.

NHBF board members and senior members of staff and are asked to declare any conflicts of interest - **Appendix 1**. The Declaration of interest's form is reviewed on an annual basis and updated when circumstances change.

RELEVANCE

This policy is relevant to all staff and board members associated with the NHBF.

RECOGNISING CONFLICTS

A conflict of interest is where an individual or organisation has competing interests or loyalties. Conflicts of interest can arise in a variety of circumstances and it is likely that people working with or for us may encounter potential conflicts of interest from time to time.

MANAGING CONFLICTS

When a conflict or potential conflict is identified associated with the NHBF, individuals will declare and log any potential conflicts of interest relating to the area of work.

In these circumstances the potential conflict will be reviewed by the nominated person depending on the individual involved before any proposals on outcomes are made. The circumstances of the disclosure will dictate who is involved in the discussion.

This can be either:

- The Chief Executive and a minimum of one member of the Senior Management Team (SMT) (internal NHBF staff conflicts of interest).
- The NHBF Chairperson and a minimum of one NHBF board member (board members and Chief Executive conflicts of interest).
- The Chief Executive and a minimum of one NHBF board member (NHBF Chairperson).

The conflict of interest policy should be viewed alongside the following NHBF policies:

- NHBF Anti-bribery policy
- General Data Protection Regulation (GDPR) and confidentiality policy
- Whistle blowing policy



CONFLICT OF INTEREST – PROCEDURE

The procedure for reporting and managing potential or existing conflicts is as follows:

1. DECLARE INTEREST

Individuals to declare identified potential or actual conflict

2. RESOLUTION OF CONFLICT

- A group discussion should take place between nominated persons, unless they are involved, or close to the disclosure. In this case, depending on the individual involved the NHBF's Chief Executive or NHBF Chairperson will make the decision about who should hold the discussion.
- The purpose of the discussion is to reach a decision about how the conflict will be managed, at least two people should be involved at this stage.
- The circumstances of the disclosure will dictate who is involved in the discussion.
- The individual raising the possibility of a conflict will also take part in the discussion, if this is appropriate.

3. DECISION

Normally it will be sufficient to:

- gain an undertaking from the individual to conduct their responsibilities so that integrity of the NHBF is maintained, as well as their own integrity
- reorganise activities and/or key functions so that the conflict is mitigated.
- If neither of the above steps is possible, another solution must be agreed by the discussion group. The solution should be in proportion to the nature of the conflict; in extreme circumstances, activities may need to be monitored or even restricted. The decision about how the conflict is managed is final.

4. LOG CONFLICT AND RESOLUTION

- A conflict of interest form and log must be completed – Appendix 2

5. MONITOR AND REVIEW DECISIONS AND ACTIONS

The log should be reviewed from time to time to ensure that actions forming part of the resolution have been implemented.

APPENDIX 1 - DECLARATION OF INTERESTS' FORM

Form for declaration of interests by members of the Board and the senior management of the National Hair & Beauty Federation Limited

DECLARATION OF INTEREST

I declare that the interests recorded below include each and every interest, which might be considered to have a potential to influence the exercise of impartial judgement by me in my connection with the National Hair & Beauty Federation Limited.

Name

Signature Date

Please record your interests under the appropriate heading in the table below.

1. REMUNERATION

List the names of any organisations (including your present employer) from which you currently draw a salary or other remuneration including honoraria, long-term or regular consultancies, and any directors' fees or other emoluments from private companies or PLCs. Short-term or one-off consultancies need not be included unless the organisation concerned is likely – or possibly seeking – to do business with the National Hair & Beauty Federation Limited. In no case are you expected to disclose the level of salary or other payments.

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2. DIRECTORSHIPS

List the names of any private companies or PLCs of which you are currently a director, or of which you have been a director at some point during the last three years, or of which you expect to become a director within the next year (whether paid or unpaid). You are not expected to disclose the level of any directors' fees or other emoluments.

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3. SIGNIFICANT SHAREHOLDINGS

List the names of any companies or businesses – whether private or publicly-quoted

– in which you hold a significant shareholding. 'Business' should be taken to include consultancies, partnerships and the like; you will be deemed to have a 'significant share-holding' if you own more than 5 per cent or more of the business (normally 5 per cent or more of the issued share capital). You are not expected to disclose the level of your financial interest in these companies or businesses.

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4. RESEARCH INCOME FOR WORK OVER £50,000 OF GRANT.

5. UNREMUNERATED ACTIVITIES PURSUING ACTIVITIES RELATED TO THOSE OF THE NATIONAL HAIR & BEAUTY FEDERATION LIMITED.

List the names of any unpaid offices you hold – for example, in a company, higher education institution, charity or not for profit or public body – which you consider might have a bearing on your role. You should include any charity trusteeships you hold, or any other way in which you participate in the management of a charity or not for profit organisation.

6. POLITICAL PRESSURE GROUPS OR ASSOCIATIONS WHERE THEIR OBJECTIVES ARE RELATED TO THE ACTIVITIES AND OBJECTS OF THE NATIONAL HAIR & BEAUTY FEDERATION LIMITED.

7. FAMILY INTERESTS

List any interests you have through your members of your family having interests which might be considered to have a potential to influence the exercise of impartial judgement by you in your connection with the National Hair & Beauty Federation Limited

APPENDIX 2 - CONFLICT OF INTEREST -DECLARATION, DISCUSSION AND RESOLUTION

PERSON RAISING ISSUE	DATE	NATURE OF CONFLICT IDENTIFIED	DISCUSSION	RESOLUTION
			DATE:	SHORT TERM:
			ATTENDEES:	
			DISCUSSION POINTS:	LONG TERM: