



# Conflict of Interest Policy

<b>Issue Date</b>	February 2026	<b>Reference</b>	P/016
<b>Next Review Due</b>	February 2029	<b>Review Cycle</b>	3 Years
<b>Reviewing Panel</b>	Board of Trustees		
<b>Applicability</b>	Employees Executive Committee Trustees Volunteers		

## 1. Abstract

- 1.1. Josephine Butler Junior Common Room CIO (“the JCR”) is a registered charity, with a duty to ensure the highest standards of behaviour, and to prevent, identify, and act upon corruption, fraud, and irregularity.
- 1.2. Therefore, the JCR expects its employees, volunteers, and trustees to commit to upholding and promoting these standards.
- 1.3. The purpose of this policy is to detail how conflicts of interests are controlled, explains what the term is, and what measures and procedures shall be taken to mitigate these conflicts.

## 2. Definition

- 2.1. A conflict of interest is defined as any financial or personal relationship that an individual may have in any relation, or proposed relation, between the JCR and: an external body, individuals within the JCR, or groups within the JCR (the “entity”).
- 2.2. When deciding a matter which may involve an external body, an individual, or a group of individuals, and an individual with a personal, financial, or non-financial relation with this entity must declare the conflict of interest, from the commencement of the meeting, up to the point at which the entity is being discussed.
- 2.3. In the case of a conflict of interest, the chair of the meeting where the decision is being made may decide to:
  - 2.3.1. Allow the voting member to participate in the discussion without restrictions;
  - 2.3.2. Allow the voting member to speak in the discussion, but not be permitted a vote;
  - 2.3.3. Not allow the voting member to speak or vote in the discussion, but may be permitted to listen;
  - 2.3.4. Not allow the voting member to speak or vote in the discussion, and may not be permitted to listen through the discussion.
- 2.4. In the case of a conflict of interest from the chair, they shall nominate someone in the meeting without any conflict of interest for the segment of the meeting to be chair for that segment only. This temporary chair may make decisions highlighted in 2.3.

### **3. Personal Relationships**

- 3.1. A “personal relation” or “personal relationship” is defined as a relation between a voting member and an individual entity. This definition includes a self-relation (i.e. the individual entity is the voting member), family relation, a romantic relation, a sexual relation, a platonic relation, or living with the individual at the same household or flat.
- 3.2. A “platonic relation” in this case is defined as a closer friendship, for instance, often meeting with the individual as friends. Being friendly with the person does not automatically constitute such relation.
- 3.3. The rationale for this is to ensure the individual entity is not unfairly favoured, and to protect the person voting on the decision from interpersonal conflicts, for instance, if something is passed against the individual entity’s favour. Failure to disclose such relation may lead to disciplinary action by the Board of Trustees.

### **4. Sexual Relationships**

- 4.1. The JCR discourages sexual relationships between employees and JCR members, trustees and employees, or trustees and JCR member. However, this is not prohibited if such relation is permitted by English law.
- 4.2. Should there be such sexual relationship, it must be declared to the JCR President, and the Chair of the Board of Trustees. This information must be kept confidential, and must not be disclosed, unless there is a legitimate concern, such as a welfare concern.
- 4.3. One must note that, in these cases, there exists a power imbalance, and that in such relation, it is expected that the trustee, or employee, in the relation does not abuse their position, including by making non-consensual sexual advances, pressuring the member (or employee, for trustees) into sexual relationships, or any other form of sexual harassment or coercive control.
- 4.4. Failure by an employee, or trustee, to comply with this could lead to disciplinary action being taken against the employee, or trustee, by the Board of Trustees.
- 4.5. The Board of Trustees will be available to offer advice and information to individuals about this policy.

## 5. Financial and Non-Financial Relationships

- 5.1. A “financial relation” or “financial relationship” is defined as a relation between a voting member and an entity, which may include:
- 5.1.1. Any employment from the entity carried on for profit or gain;
  - 5.1.2. Sponsorships received from the entity;
  - 5.1.3. Contracts with the entity, either directly or indirectly;
  - 5.1.4. Ownership of the entity, in the case of corporate bodies, where the voting person has at least 25% of shareholdings, and/or a shareholding worth more than £2,500.
  - 5.1.5. Gifts and Hospitality gained from the entity with a total value of over £10.
- 5.2. A “non-financial relation” or “non-financial relationship” is defined as a relation between a voting member and an entity, which may include:
- 5.2.1. A membership with the entity, for instance, a political party or trade union;
  - 5.2.2. A voluntary role with the charity or non-profit, including being a trustee.
- 5.3. A record of all gifts and hospitality received by a trustee, employee, or member of the JCR’s Executive Committee, as per 5.1.5 must also be reported to the Board of Trustees and JCR President via email.
- 5.4. Failure to declare a financial or non-financial relationship may result in disciplinary action by the Board of Trustees.

## 6. Implementation

- 6.1. The Chair of the Board of Trustees, or their deputy, and the JCR President, will ensure that this policy is brought to the attention of employees, volunteers, and trustees, and will ensure they shall declare such conflicts of interest when required to do so.
- 6.2. The Board of Trustees shall monitor the implementation of this policy.
- 6.3. Breach of this policy may lead to disciplinary action. Any disciplinary action will be dealt with in accordance with the Discipline Policy (Policy P/026)

## 7. Approval & Review

7.1. This Conflict of Interest Policy was prepared in December 2025 by the Compliance and Governance Officer, with the assistance of the JCR President, on behalf of the Board of Trustees.

7.2. This policy shall be reviewed every three years by the Board of Trustees, in consultation with the JCR President, and the JCR Executive Committee.

**This Conflict of Interest Policy has been approved by the JCR President, and the Board of Trustees.**

Signed David Evans  
Signature



Dated Date 21/02/26  
Position **Chair, Board of Trustees**

Signed Joshua Barrett  
Signature



Dated Date 19/02/26  
Position **JCR President (2025-26)**