

RIVER ACADEMY AT KALLANG LTD CONFLICT-OF-INTEREST POLICY

Introduction

1 This Policy* is meant to help River Academy at Kallang Ltd (Organisation) adopt good practices for better governance, accountability and transparency.

2 The Conflict-of-Interest Policy must be read by all Board members, staff and volunteers upon hiring, appointment to the Organisation as an acknowledgement of having understood the policy and that he/she will fully disclose to the Board of the Organisation when a conflict-of-interest situation arises.

3 As members of the Organisation, we have an obligation to act in its best interest. Hence, we need to avoid situations where there may be real, potential or perceived conflicts of interest, which may arise where a Board member's, staff and volunteers member's personal or family interest conflicts with those of the Charity.

Such conflicts may create problems that may result in the following:

- a. Cause damage to the Organisation's reputation which may lead to its inability to sustain operations;
- b. Influence the members' judgment and compromise objectivity when conducting the Organisation's affairs;
- c. Restrict free discussion, thus resulting in decisions or actions that are not in the interests of the Organisation; and
- d. Risk the impression that the Organisation has acted improperly.

4 This Policy aims to protect both the Organisation and its members from any appearance of impropriety.

2. Definitions

2.1. "Charity" refers to the charity named as the issuer of this document.

2.2. "Member" refers to a board member or management member or staff member or volunteer member of the charity.

2.3. "Policy" refers to the Conflict-of-Interest Policy.

2.4. "Interest" means any commitment, investment, relationship, obligation, or involvement, financial or otherwise that may influence a person's judgement. This would include:

- a. Direct interest – ownership in the name of the member/staff/volunteer;
- b. Indirect interest – ownership beneficially held through another investment, estate, trust or other intermediary;
- c. Vested interest – personal stake or involvement, which may or may not include an expectation of financial gain; and
- d. Deemed interest – a member/staff /volunteer is deemed to have an interest which his/her spouse/domestic partner holds an interest.

2.5. A conflict of interest arises when the personal interests of the member/staff/volunteer may potentially interfere with the performance of his/her duties in the charity. When actual, potential or perceived conflict of interest arises, the integrity, fairness and accountability of the person may be affected, which could impede the best interest of the charity.

3. Declaration of Interests

3.1. Given the stated purpose of this Policy, we are asking:

- a. Board, staff, volunteers to declare their interests, and any gifts or hospitality received in connection with their role in the Organisation; and
- b. Board, member, staff and volunteers to declare when the transaction to be executed may result in a conflict of interest.

3.2. A form for declaration of interests is provided for this purpose. The types of interest to be declared will include, but not limited to the following:

a. Board Members, staff and volunteers who have friends or other personal or business relationships must carefully consider whether those relationships create conflicts of interest with their entrusted role in the Organisation.

Examples include:

- i. hiring a relative or friend as an employee or vendor,
- ii. buying or selling goods or services from / to a family business for which others might compete,
- iii. having a personal relationship where there is an immediate reporting relationship,
- iv. volunteering and/or having memberships in any other charities, or
- v. receiving goods/services as beneficiaries

b. Board Members, staff and volunteers must disclose any outside activities, financial interest or relationship that may pose a real, potential or perceived conflict of interest. Disclosures are to be made to the Board/senior management/supervisors and head of the Human Resources Department, with the required approval obtained before accepting any position as an officer or director of an outside business.

3.3. To be effective, the declaration of interests needs to be updated in written form at least annually and also when any changes occur.

3.4. In situations where members are not sure what to declare, or whether/when your declaration needs to be updated, they are strongly encouraged to err on the side of caution or seek advice from the Board/ senior management/supervisors.

3.5. All disclosure of interest made by members and decisions made by the Board/senior management of the Organisation on such matters must be recorded, updated and filed with the head of the Human Resources Department (or his/her designee).

3.6. A register of interests shall also be used to record all gifts received by members. An estimated cost of the gift should be included in the record.

4. Operating Procedures

4.1. If the Board needs to make a decision on an issue where the Board member(s), staff and volunteers has/have an interest, it is the responsibility of the Board member(s) to:

- a. Identify the potential conflict of interest;
- b. Not participate in discussion of the programme or motion being considered;
and
- c. Not vote on the issue.

4.2 If the Board needs to make a decision on an issue where the Board member(s), staff and volunteers has/have an interest, it is the responsibility of the Board to ensure that:

- a. All decisions are made by vote, with a two-thirds majority required based on the presence of a quorum; and
- b. Interested board members must not vote on matters affecting their own interests.

4.3 It is the responsibility of the Board to:

- a. Only decide to hire or contract with any vendor if they are the best qualified individuals available, and willing to provide the goods or services needed at the best price. The Board's decision shall not be influenced in any way by the fact that a Board member has an interest in the contract.
- b. Record in the minutes of the Board Meeting the potential conflict of interest, and the use of the procedures and criteria of this policy.

4.4 It is the sole responsibility of any member of the Organisation to report any possible real, potential or perceived conflict of interest. If it is an oversight of the Organisation, the member shall promptly inform the Organisation that he has been put in such a position of conflict of interest.

4.5 No member of the Organisation shall derive any personal profit or gain, directly or indirectly, by reason of his or her participation with the Organisation. Each individual shall disclose to the Organisation any personal interest which he or she may have in any matter pending before the organisation and shall refrain from participation in any decision on such matter.

4.6 Any member of the Organisation or of a client or vendor of the Organisation shall identify his or her affiliation with such agency or agencies; further, he shall not participate in the decision affecting that agency.

4.7 Any member of the Organisation or its Consultants / Business Partners shall refrain from obtaining any list of clients for personal or private solicitation purposes at any time during the term of their affiliation.

4.8 Any member who is also a user of the Organisation's services, or the carer of someone who uses the Organisation's services shall not be involved in decisions that directly affect the service received by the person he / she cares for. He/she shall declare his/her interest at the earliest opportunity and withdraw from any subsequent discussion. The same applies if the conflict concerns any other reason(s).

4.9 A member of the Organisation may, however, participate in discussions from which he / she may indirectly benefit, for example where the benefits are universal to all users.

4.10 The Board of the Organisation shall have the right to suspend any involvement of any member/staff/volunteer when it has come to their attention that a potential actual or perceived conflict has arisen, but has not been voluntarily disclosed by the relevant member.

5. Violations

5.1 Any violation will result in discipline, up to and including termination from employment or removal from the board, or expulsion from being a volunteer member of the Organisation.

End of Policy

Updated on 23 June 2024

**River Academy at Kallang Ltd
Conflict of Interest Disclosure Statement**

With regard to my service as _____ (e.g. Chairman, Director, Treasurer, Teacher, Instructor, Volunteer etc.) of the River Academy at Kallang Ltd, I have the following potential conflict of interest to report: (please tick Yes/No)

Potential Conflict of Interest	Yes	No
I am affiliated to another Social Services Organisation (SSO)		
I am affiliated to a vendor, supplier, or any other party providing or bidding for providing services, having a direct or indirect interest in any business transaction(s), agreement, and investment with River Academy at Kallang Ltd.		
I have business dealings or transaction with a vendor, supplier or any other party which could result in benefit to me.		
I or person(s) I have affiliation with, have interest in purchasing services from River Academy at Kallang Ltd.		
I am affiliated to a staff of River Academy at Kallang Ltd.		
Affiliated person(s) involved is a party to or have an interest in any pending legal proceedings involving River Academy at Kallang Ltd.		

Others: _____

If **Yes**, please elaborate on the potential conflict arising from the above situation with regards to the transaction concerned (e.g. nature of service/transaction, if affiliated person involved, the identity of the affiliated person and your relationship with that person):

** Affiliated refers to the following: Spouse, domestic partner, child, mother, father, brother or sister or close associates; any corporation, business or non-profit organisation of which you are serve as staff, officer, board member, partner, participate in management or are employed by; any trust or other estate in which you have a substantial interest or as to which you serve as a trustee or in a similar capacity.*

**RIVER ACADEMY AT KALLANG LTD
CONFLICT OF INTEREST DECLARATION**

Period of Disclosure: _____

1. I hereby confirm that I have read and understood the Conflict-of-Interest Policy of River Academy at Kallang and that the disclosure made above is complete and correct to the best of my information and belief.

2. I shall not be participating in the discussion of and decision making on this matter. I agree that if I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with the conflict-of-interest policy, I will notify the Chairman of the Board immediately.

Signature
Name/Designation
Date