SNAP Parent Carer Forum CIC

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Conflict of Interest Policy

Policy Owner: Chief Executive Officer
Approved by: Company Director(s)
Effective Date: August 2026
Review Date: August 2029, or sooner if required.

1. Introduction

SNAP Parent Carer Forum (SNAP PCF) is committed to acting with integrity, openness, transparency, and accountability.

People involved in SNAP PCF may have personal, professional, financial, or family interests that overlap with the work of the organisation. This is particularly relevant to a parent carer forum, where people may have direct experience of SEND services and may also work for, receive services from, or have relationships with organisations with which SNAP PCF works.

Having a conflict of interest is not, in itself, wrongdoing.

The purpose of this policy is to ensure that relevant interests are declared openly and managed fairly and proportionately.

The policy protects both the individual and SNAP PCF and supports confidence in the independence and integrity of the organisation.

This policy should be read alongside the Code of Conduct.

2. Who this policy applies to

This policy applies to people carrying out governance, representative, employment or other authorised responsibilities on behalf of SNAP PCF, including:

- Company Director(s);
- Chief Executive Officer;
- Steering Group Committee Members;
- Parent Representatives;
- employees; and
- contractors or agency workers where relevant.

Parent Representatives are covered whether they volunteer their time or invoice SNAP PCF for agreed work.

The policy will be applied proportionately according to the individual's role, the circumstances and SNAP PCF's risk appetite.

3. What is a conflict of interest?

A conflict of interest may arise where a person's personal, professional, financial or family interests could:

- influence their judgement or actions on behalf of SNAP PCF;
- result in them or someone connected to them receiving a benefit;
- conflict with their responsibilities to SNAP PCF; or
- reasonably appear to affect their ability to act impartially.

A conflict can be:

- **Actual,** A conflict currently exists.
- **Potential,** A conflict could arise in the future.
- **Perceived,** A reasonable person could believe that a conflict exists, even where the individual believes they can act impartially.

SNAP PCF will consider actual, potential and perceived conflicts and manage them proportionately according to the circumstances.

Personal experience is not automatically a conflict.

A person's experience as a parent carer, including their experience of education, health or social care services, does not automatically constitute a conflict of interest.

4. Principles

Everyone covered by this policy should:

- act in the best interests of SNAP PCF when carrying out responsibilities on its behalf;

- be open and honest about relevant interests;
- declare conflicts as soon as they become aware of them;
- not use their SNAP PCF role, position, organisational resources or working relationships to obtain personal, financial or other advantage for themselves, their family or another person;
- not improperly influence decisions because of a personal interest; and
- comply with reasonable arrangements put in place to manage a conflict.

SNAP PCF will seek to manage conflicts rather than automatically exclude people from their roles.

4.1 Personal matters and use of SNAP PCF position

Being a Parent Representative, employee, Director, Steering Group Committee Member or other representative of SNAP PCF does not prevent an individual from raising concerns or seeking information about their own child or family.

However, individuals must keep their personal matters separate from their responsibilities on behalf of SNAP PCF.

Individuals must not:

- use their SNAP PCF role, position, authority, influence or working relationships to obtain information, assistance, access or an advantage in relation to their own personal or family circumstances;
- use a SNAP PCF email address, letterhead, meeting invitation, documents, systems or other organisational resources to pursue a personal matter;
- use a meeting or contact with a Local Authority, NHS organisation, school or other partner that is taking place in their SNAP PCF capacity to pursue their own child's case or another personal matter;
- suggest or imply that they should receive different or preferential treatment because they are associated with SNAP PCF;
- use relationships developed through their SNAP PCF role to seek preferential access, information or treatment for themselves, their child, family member or another person connected to them; or
- represent a personal request as being made on behalf of SNAP PCF unless this has been specifically authorised.

Where an individual needs to raise a matter concerning their own child or family, they should do so separately from their SNAP PCF role and use the normal communication route available to them as a parent or service user.

For example, a Parent Representative may attend a meeting with a Local Authority in their SNAP PCF capacity and contribute to discussions about EHCP processes but should not use that meeting to ask for information about their own child's EHCP or seek action on their own child's case.

Similarly, a Parent Representative should not use a SNAP PCF email account to correspond with a partner organisation about their own child's case. Personal correspondence should be made using the individual's personal contact details and through the appropriate route for parents or service users.

This does not prevent a Parent Representative from sharing their own experience as part of SNAP PCF's evidence-gathering or parent-carer voice work, provided that this is relevant to the agreed purpose of the activity and is not used to seek preferential treatment for their own circumstances.

If there is any uncertainty about whether an issue is being raised in a personal capacity or on behalf of SNAP PCF, the individual should seek guidance from the CEO before proceeding.

5. Examples of conflicts

Examples may include:

- employment or self-employment with an organisation that works with SNAP PCF;
- being a Director, trustee, committee member or other representative of an organisation, whose interests overlap with SNAP PCF;
- owning or having a financial interest in a business providing relevant services;
- involvement in awarding work to a friend, relative or connected organisation;
- involvement in recruitment where a friend or relative is an applicant;
- involvement in a funding or procurement decision affecting an organisation with which the individual is connected;
- receiving a significant benefit, gift or hospitality that could influence decision-making;
- involvement in a campaign organisation where this overlaps with the individual's SNAP PCF responsibilities; or
- representing SNAP PCF on an issue where the individual has a significant personal interest.

- using a SNAP PCF role, meeting, email account, organisational resource or relationship with a partner organisation to pursue an individual's own case or the case of a family member;
- seeking preferential access, information, treatment or assistance from a partner organisation because of an individual's association with SNAP PCF.

This list is not exhaustive.

6. Family and relationships with partner organisations

SNAP PCF recognises that people involved in SEND may have family members or partners who work within education, health, local authorities, or voluntary organisations.

A family relationship is not automatically a conflict of interest.

A relationship should be declared where it could affect, or reasonably appear to affect, the individual's SNAP PCF responsibilities.

This may include a spouse, partner, close family member, or household member working for:

- a local authority;
- an NHS organisation;
- a school or college;
- a commissioned SEND service;
- a voluntary or community organisation;
- or another organisation with which SNAP PCF works.

The existence of the relationship will not normally prevent the individual from participating in SNAP PCF activities.

Where necessary, SNAP PCF will consider appropriate arrangements to manage a particular conflict.

6.1 Steering Group membership and close connections with partner organisations

Where a person is being considered for membership of the SNAP PCF Steering Group, any close relationship with an organisation involved in Children's Services, SEND, education, health or social care should be considered as part of the conflict-of-interest assessment.

This includes where a person's spouse, partner or family member works for, or has a significant professional relationship with:

- Central Bedfordshire Council, particularly Children's Services, SEND or related services;
- an NHS organisation or service involved in children's health or SEND;
- a school, college or other education provider;
- a commissioned service working closely with Children's Services or SEND; or
- another organisation with which SNAP PCF has a significant working relationship.

Having a spouse, partner or family member who works for one of these organisations does not automatically prevent someone from becoming a Steering Group member.

However, where the person's role, responsibilities or professional relationships could create an actual, potential or perceived conflict with the interests of SNAP PCF, their suitability for Steering Group membership will be considered before appointment.

A Steering Group membership may not be appropriate where the conflict is significant, ongoing and cannot reasonably be managed. This may particularly apply where the spouse, partner or family member has a senior, decision-making, commissioning, operational or direct service role closely connected to the areas in which SNAP PCF represents parent carers.

The assessment will consider:

- the nature and seniority of the spouse, partner or family member role;
- the person's own relationship with the relevant organisation;
- whether confidential or sensitive information could create a conflict;
- whether the person may be placed in a position where they are expected to challenge, influence or scrutinise their spouse or partner's organisation;
- whether the relationship could reasonably affect, or be perceived to affect, SNAP PCF's independence; and
- whether the conflict could be managed effectively without undermining the person's ability to carry out the Steering Group role.

SNAP PCF's priority is to maintain the independence, credibility and integrity of the Steering Group and its ability to provide constructive challenge and parent-carer oversight.

Where a conflict cannot be appropriately managed, SNAP PCF may decide that Steering Group membership is not appropriate. This will be considered on a case-by-case basis, and the decision will be explained to the individual.

Assessment of suitability and appointment decisions

Where an actual, potential or perceived conflict of interest is identified during the consideration of a person for Steering Group membership, SNAP PCF will assess whether the conflict can be managed effectively within the responsibilities and purpose of the role.

The assessment will consider:

- The extent to which the person's personal, professional or family connections overlap with SNAP PCF's work and strategic relationships.
- Whether the conflict is occasional or ongoing.
- Whether managing the conflict would require the person to be excluded from significant discussions, information or activities.
- Whether restrictions would undermine the person's ability to contribute meaningfully to the Steering Group.
- Whether the arrangements required to manage the conflict would compromise SNAP PCF's independence, confidentiality or ability to provide constructive challenge to partner organisations.

Where SNAP PCF concludes that an actual, potential or perceived conflict is significant, ongoing and cannot reasonably be managed without undermining the effectiveness or independence of the Steering Group, it may decide not to appoint the individual.

Appointment decisions will be based on the requirements of the role, the organisation's governance responsibilities and an assessment of the individual circumstances. Decisions will be applied consistently, recorded appropriately and explained to the individual.

The existence of a family or professional relationship will not automatically prevent appointment. Each situation will be considered on its individual circumstances.

Current and previous employment with partner organisations

The assessment of suitability for Steering Group membership will also consider where an individual is currently employed by, or has previously been employed by, an organisation with which SNAP PCF has a significant working relationship.

This may include Central Bedfordshire Children's Services, SEND services, education providers, NHS organisations or commissioned services.

Relevant considerations may include the nature and seniority of the individual's role, their responsibilities, access to confidential or sensitive information, ongoing

professional relationships and the extent to which their work overlaps with SNAP PCF's responsibilities.

Previous employment will not automatically prevent someone from becoming a Steering Group member. However, where current or previous employment creates a significant, ongoing actual, potential or perceived conflict that cannot reasonably be managed, SNAP PCF may decide that appointment is not appropriate.

7. Personal complaints and legal proceedings

SNAP PCF recognises that parent carers may need to challenge decisions concerning their own children.

This may include:

- SEND Tribunal proceedings;
- complaints to an Ombudsman;
- statutory complaints procedures;
- Judicial Review; or
- other lawful processes.

Taking such action does not automatically prevent someone from being involved with SNAP PCF.

Where the matter could reasonably affect the individual's SNAP PCF responsibilities, they should declare the potential conflict.

For example, a Parent Representative involved in a dispute about their own child's EHCP may continue with other SNAP PCF activities. However, they may need to step back from representing SNAP PCF in a matter directly connected with their own dispute.

The existence of a personal complaint, Tribunal case or other legal process is not, by itself, evidence of wrongdoing or unsuitability.

8. Campaigning and public commentary

SNAP PCF recognises that individuals may hold personal views and participate in lawful campaigning or public debate.

Supporting a campaign or expressing a personal view does not automatically create a conflict of interest.

A conflict may arise where an individual's campaigning, public commentary or involvement with a campaign organisation creates an actual, potential or perceived conflict with their responsibilities to SNAP PCF.

Relevant circumstances should be declared where, for example, an individual:

- holds a leadership or representative role within a campaign organisation;
- publicly represents a campaign organisation on an issue directly connected with their SNAP PCF responsibilities;
- uses their SNAP PCF position, information or resources to support a personal campaign; or
- could reasonably be perceived as speaking for both SNAP PCF and the campaign organisation.

Any conflict will be considered and managed proportionately.

Holding a leadership or representative role in a campaign organisation does not automatically prevent an individual from holding a role with SNAP PCF. Any actual, potential or perceived conflict will be declared, assessed and managed proportionately.

The Code of Conduct sets out the wider expectations concerning personal views, campaigning, public commentary, and representing SNAP PCF.

9. Declaring interests

People covered by this policy should complete a Declaration of Interests:

- when starting their role;
- when requested as part of an annual review; and
- when a relevant interest changes.

People have an ongoing responsibility to declare a relevant new interest when it arises.

Declarations may include:

- employment or self-employment;
- directorships or trusteeships;
- other governance or representative roles;
- relevant voluntary roles;
- businesses or organisations connected to SEND;
- relevant financial interests;
- relevant family or household employment;
- relevant campaign organisation involvement; and
- any other interest that could reasonably be perceived as creating a conflict.

Close personal relationships with people working in organisations with which SNAP PCF has significant working relationships, where the relationship could reasonably create an actual, potential or perceived conflict.

People do not need to declare every personal interest or circumstance. The interest needs to be relevant to their SNAP PCF role.

10. Register of interests

SNAP PCF will maintain a Register of Interests for relevant governance and representative roles.

The Register will record, where appropriate:

- the person's name and role;
- the relevant interest;
- the date declared; and
- any action taken to manage the conflict.

The Register will be held securely and will not normally be published.

Information may be shared where necessary for legitimate governance, legal, safeguarding or regulatory purposes.

The Register will be reviewed periodically and at least annually for relevant roles.

11. Declaring a conflict during a meeting

Where an individual becomes aware of a conflict relating to an item being discussed, they should declare it to the person responsible for the meeting or decision.

This does not require a formal declaration at every meeting.

Where appropriate, the declaration and any action taken will be recorded in the meeting notes or minutes.

12. Managing a conflict

SNAP PCF will consider the circumstances and determine an appropriate and proportionate way of managing the conflict.

This may include:

- allowing the person to provide factual information but not take part in the decision;
- asking the person to withdraw from the relevant discussion;
- restricting access to confidential information;

- allocating the matter to another representative or decision-maker; or
- seeking independent advice where appropriate.

The action taken will depend on the nature and seriousness of the conflict.

Declaring a conflict does not automatically mean that the person has to leave their role.

13. Recruitment

Anyone involved in recruiting employees, Parent Representatives, contractors or other workers must declare any relevant personal relationship or other conflict involving an applicant.

Where necessary, they will take no part in the relevant recruitment decision.

Recruitment decisions should be based on the suitability and merits of candidates.

14. Procurement and Purchasing

SNAP PCF will seek to make purchasing and procurement decisions fairly, transparently and in the best interests of the organisation.

Anyone involved in selecting or approving a supplier must declare a relevant interest involving:

- a supplier;
- contractor;
- consultant; or
- another organisation or person connected to the procurement.

A person with a relevant conflict must not influence or approve a decision where they or someone connected to them could benefit.

Procurement should follow SNAP PCF's Financial Regulations and procurement arrangements.

15. Gifts and Hospitality

Individuals must not seek or accept gifts, hospitality, or other benefits where these could influence, or reasonably appear to influence, their SNAP PCF responsibilities.

Reasonable hospitality associated with legitimate meetings or events may be accepted.

Significant or unusual gifts or hospitality should be declared.

Cash gifts must not be accepted.

16. Responsibilities

Company Director(s)

The Company Director(s) are responsible for ensuring that appropriate governance arrangements are in place for managing conflicts of interest.

Chief Executive Officer

The Chief Executive Officer is responsible for administering this policy and maintaining the Register of Interests within their delegated authority.

Where a conflict concerns the Chief Executive Officer, it should be referred to the Company Director(s).

Steering Group Committee

The Steering Group provides appropriate parent-carer insight, oversight, and constructive challenge within its agreed role.

Everyone covered by this policy

Everyone is responsible for:

- declaring relevant interests;
- keeping their declarations reasonably up to date;
- declaring conflicts when they arise; and
- complying with agreed arrangements for managing a conflict.

17. Failure to Declare a Conflict

Failing to declare a relevant conflict may constitute a breach of this policy and, where applicable, the Code of Conduct or employment obligations.

SNAP PCF will consider the circumstances before taking action.

Depending on the circumstances, this may include:

- clarification or guidance;
- additional training;
- changes to responsibilities;
- removal from a particular decision or activity;
- removal from a representative or governance role; or
- disciplinary action where the individual is an employee.

Any action will be fair and proportionate.

18. Director and CEO conflicts

Where a conflict concerns the Chief Executive Officer, the matter should be referred to the Company Director(s).

Where a conflict concerns a Company Director, the matter should be dealt with in accordance with the Articles of Association and relevant governance arrangements.

No individual should be responsible for determining an outcome in relation to their own conflict.

Where appropriate, independent advice may be sought.

Where the Chief Executive Officer is also a Company Director, a conflict of interest arises when the CEO is involved in a decision concerning their own salary, remuneration, expenses or other personal financial benefit.

The CEO must declare the conflict and must not approve or determine the outcome of the matter.

The matter must be considered through the independent approval arrangements established by SNAP PCF.

ppendix A – Declaration of Interests

SNAP Parent Carer Forum (SNAP PCF)

Name: _____

Role: _____

Date: _____

Please declare any interests that could create an actual, potential, or perceived conflict with your SNAP PCF responsibilities.

Interest	**Provide details**
Employment / self-employment	
Directorships / trusteeships / governance roles	
Other representative roles	

Interest	Provide details
Relevant businesses or organisations	
Relevant family or household employment	
Relevant financial interests	
Relevant campaign organisation involvement	
Other relevant interests	

Declaration

I confirm that I have declared relevant interests to the best of my knowledge.

I understand that I should declare any new or changed interest where it could create an actual, potential or perceived conflict with my responsibilities to SNAP PCF.

Signature: _____

Date: _____