LIBERTY

Conflicts of Interest

A summary for people thinking of applying to work with us

Why this matters

Liberty's authority rests on our independence. When we campaign, litigate, brief parliamentarians or speak to the press, our work carries weight because we are seen to act in the public interest, and not in anyone's private interest.

We know that the people who join us have lives, commitments, convictions and expertise outside Liberty, and that is a good thing. Our Conflict of Interest Policy is not designed to stop any of that. It sets out how we identify, declare and manage situations where an outside interest could affect, or could reasonably be seen to affect, someone's ability to act impartially on Liberty's behalf.

We share this summary with everyone considering a role with us, so that you can see what will be expected **before** you apply. If you are offered a role, the offer will be conditional on you completing a Declaration of Interests form and agreeing to comply with our Conflict of Interest Policy. We will send you the full policy when we send you a conditional offer.

What we mean by a conflict of interest

A conflict of interest arises where your duties to Liberty conflict, or might reasonably be seen to conflict, with an interest of your own (personal, financial, professional or political), a duty you owe to another organisation or person, or an interest held by someone you are closely connected to.

It does not depend on whether you would actually be influenced. Perception matters as much as reality, because our credibility depends on it. There are three types, and all three must be declared:

Type	What it means
Actual	The conflict exists now. You would be making, influencing or contributing to a decision in which you have a competing interest.
Potential	The conflict does not exist yet, but there is a reasonable likelihood it will. For example, you are a trustee of an organisation that does not currently approach Liberty's funders or partners, but is likely to.
Perceived	A reasonable outside observer, knowing the facts, could think your judgement might be affected, even if you are confident it is not.

Conflicts can be financial (such as payment, shares, gifts or hospitality, or a benefit to someone close to you) or non-financial (such as loyalty to another organisation, a professional duty, reputation or career advantage, or a strong commitment to a cause or party). Non-financial conflicts are more common at Liberty and are taken just as seriously.

"Someone you are closely connected to" includes a partner or spouse, children, parents, siblings, in-laws and other close family, a household member, a close friend or personal relationship, or someone with whom you have a significant financial arrangement. It is up to you to think about what someone looking at the situation would consider close. If you are unsure, declare it.

What this means for your application

Holding an interest **does not** stop you applying, and it will not be taken into account when we assess applications. You do not need to tell us about any interests at this stage, so please do not include them in your application. If you would like to talk anything through before applying, contact our HR Team at HR@libertyhumanrights.org.uk.

If we offer you the role:

- we will send you a Declaration of Interests form with your conditional offer, along with a copy of our full Conflict of Interest Policy to help you complete it;
- if you have nothing to declare, you simply confirm that on the form;
- if you are unsure whether something counts, declare it. You will never be criticised for doing so; and
- if you do declare something, we will discuss with you how it can be managed before your contract is issued.

Most declared interests are managed straightforwardly and the outside activity continues. Occasionally an interest cannot be managed, for example because it would create a significant reputational risk for Liberty, or because the time commitment could not realistically be managed alongside the role. If that happens, we will explain our reasons to you, and the offer may be withdrawn.

What typically needs to be declared

This is a guide, not a complete list. Every declaration is considered on its own facts. If you are offered a role, this is the kind of thing we will ask you to tell us about, including roles you already hold, so we can agree how they will be managed before you start.

Situation	What you need to do
A trustee, director, chair or other governance or leadership role in another organisation, paid or unpaid	Declare and seek approval
A fundraising role in another organisation, paid or unpaid, including a trustee role with fundraising responsibility (small-scale fundraising of up to £5,000 a year, such as a sponsored event, does not count)	Declare and seek approval
Any other paid work, including consultancy, freelance work, training or teaching	Declare and seek approval
A judicial or quasi-judicial appointment (for example magistrate or tribunal member), or another public appointment	Declare and seek approval
Holding office in a political party, standing as a candidate, or acting as an agent, treasurer or officer	Declare and seek approval
Speaking at an external event in a personal capacity, where your Liberty role is known or could reasonably be identified	Declare and seek approval
A donation to a political party large enough to be published by the Electoral Commission (currently over £11,180 in a calendar year to a national party, not including membership fees)	Declare and seek approval
A financial interest (such as shares, ownership, a directorship or a beneficial interest), or a close personal connection with someone involved, in an organisation you know Liberty works with, campaigns against, litigates against, contracts with or receives funding from	Declare
A close personal relationship (family, intimate or household) or significant financial connection with a member of Liberty's Executive Committee or Senior Leadership Team, or with a funder	Declare

Situation	What you need to do
A close personal relationship that is more than a friendship with someone you would manage or recruit, or whose pay, progression or performance you would influence	Declare
An interest, yours or a close connection's, in a supplier you would be involved in selecting, contracting or paying	Declare

For **senior leadership, Heads of roles, policy and campaigns team role, legal team roles, Liberty Investigates roles and other public-facing roles**, some further activity needs to be declared, and in some cases approved. Depending on the role, this includes membership of a political party (for externally facing senior leadership roles), public party political campaigning where you are identifiable as Liberty staff, and speaking to the media or writing for publication in a personal capacity. Holding party office or standing as a candidate is not normally approved for these roles, because it cannot be separated from Liberty's need to be seen as non-party-political. Senior Leadership Team members also declare all significant financial interests, whether or not they are linked to Liberty's work. The recruitment pack will tell you if any of this applies to the role you are applying for.

What you do not need to declare

These are not conflicts of interest and are not restricted or recorded under the policy:

- Trade union membership, office or activity.
- Your private political, religious or philosophical beliefs, and how you vote.
- Ordinary membership of a lawful campaigning organisation, charity or community group, where you hold no office and take no public role.
- Attending a lawful protest as an individual, although what you display, for example on a banner, could raise a conflict if it uses offensive language or refers to a public figure or someone in government.
- Jury service and other public duties you are entitled to time off for by law.
- Raising a concern, making a protected disclosure or bringing a grievance.
- Your personal life, relationships and finances, except where they touch on Liberty's work in the ways described above.

Once you join Liberty

The policy applies throughout your time with us. In summary, you will be expected to:

- declare any new or changed interest as soon as you become aware of it, and within ten working days at most;
- seek approval before taking on any new outside role or activity that requires it, and wait for a written decision before going ahead (we aim to respond within fifteen working days of receiving a complete declaration);
- declare an interest at the start of any meeting where an agenda item touches on it;
- update your declaration each January, when the register of interests is refreshed, and whenever we tell you the policy has changed (for example as Liberty moves into new areas of work); and
- take care with political, campaigning and other public activity outside work, including any unpaid legal or policy role elsewhere: do not identify yourself with Liberty or use Liberty channels or equipment, make clear you are speaking personally, keep to your confidentiality obligations, and follow our Social Media Policy.

Failing to declare an interest, or going ahead without approval where it is required, is a breach of the policy and of your contract and may be dealt with under our Disciplinary Policy. Deliberately concealing a conflict may be treated as gross misconduct. We will always consider whether a failure was deliberate, careless or an honest misunderstanding, and whether you raised it yourself when you became aware of it.

How we handle your information

We do not collect information about interests during the application process. If you are offered a role, your declaration is treated confidentially and is not shared with colleagues generally. Declarations are recorded on Liberty's register of interests, which is held by the Finance and Operations Director and seen only by a small number of senior people. Relevant details may also be shared with your line manager or head of department where they need them to manage the interest.

Some of the information you may give us, for example anything revealing political opinions, religious or philosophical belief, or health, is special category personal data under the UK GDPR. We only process it where a lawful condition applies, and only keep it for as long as our Data Retention Schedule allows. Our Privacy Notice explains how we use your information and your rights.

If your declaration includes information about someone close to you, such as a partner, family member or business partner, please let them know you have shared it with us.