Conflicts of Interest Policy

Supportive Bridge Ltd - Policy and Procedure

POLICY AT A GLANCE

- A conflict of interest is not, in itself, a problem. Not declaring one is. Tell us early, tell us in writing.
- Declare it before it matters: before you interview, recruit, supervise, allocate shifts to, discipline, or make any decision affecting someone you have a personal, family, financial or business connection with.
- Family and close relationships with a person we support must always be declared before support starts, or as soon as the connection becomes apparent.
- A second job, a side business, or a connection to a competitor, supplier or client must be declared when it starts, not just when it becomes a problem.
- The Nominated Individual keeps a Register of Interests and decides how each declared conflict is managed - recorded, restricted, or removed from the decision entirely.
- Undeclared conflicts that come to light later are treated seriously, even where no actual harm has resulted, because trust depends on openness.

Registered Manager	Iffrah Ishtiaq
Nominated Individual	Iffrah Ishtiaq
Office phone	07448266215
Out-of-hours / on-call number	
Date issued	01-10-2026
Next review date	

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1. Purpose

1.1 This policy explains what a conflict of interest is, why it matters in a care and staffing business, and how everyone working for Supportive Bridge Ltd ("Supportive Bridge", "we", "us") must declare and manage one.

1.2 People we support, families, local authorities and commissioners need to trust that decisions about care, staffing, recruitment and spending are made in the person's best interests and the business's best interests, not to benefit an individual member of staff, their family, or a connected business. This policy supports Regulation 17 (Good governance) of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 and good practice expected under local authority contracts and procurement frameworks.

2. Scope

2.1 Supportive Bridge Ltd operates in two parts: as a staffing agency, supplying care and support workers to care homes, hospitals and other regulated providers under that provider's own policies and supervision; and as a community support service, where our own support workers visit adults and older people in their own homes, including council housing, on morning and evening shifts to help with daily living.

2.2 Supportive Bridge Ltd is not currently registered with the Care Quality Commission (CQC) and does not provide personal care in any circumstances at present. This means no washing, bathing, dressing, toileting, continence care, or assistance with eating, drinking, oral, skin, hair or nail care. Personal care will only be offered once, and if, CQC registration is granted, and this policy will be updated at that point.

2.3 This policy applies to every director, manager, employee, worker, agency or bank worker, and volunteer, and to anyone involved in procurement, recruitment or decision-making on our behalf.

3. What counts as a conflict of interest

3.1 A conflict of interest is any situation where a person's private interests - financial, family, personal or business - could influence, or could reasonably be seen by someone else to influence, the decisions they make or the advice they give as part of their role with us. A conflict does not have to involve any wrongdoing to need declaring; the appearance of a conflict is enough.

- being related to, in a relationship with, or a close friend of a person we support, their family, or another member of staff you supervise, allocate shifts to, or are involved in disciplining;
- having a second job, or a family member working for, a care home, hospital, competitor agency, or a supplier we use or could use;
- having a financial interest, shareholding, or directorship in a business that supplies, or could supply, Supportive Bridge Ltd or one of our clients;
- being in a position to award work, shifts, contracts or references to a friend, relative, or business connection;
- receiving, or being offered, a fee, gift or benefit connected with introducing business, referring a candidate, or recommending a supplier (see also our Anti-Bribery and Corruption Policy);
- being asked to support, supervise, or make decisions about a family member or someone you have a close personal relationship with, whether they are a colleague or a person we support.

4. Relationships with people we support

4.1 Support work is personal, and warm, professional relationships with the people we support are a normal and valued part of the job. This policy is not about that. It is about situations that go beyond the professional relationship: being related to a person before support starts, developing a romantic relationship with a person we support, being named in a person's will, being asked to act as their attorney or appointee, or being asked to move in with or care for them privately outside of Supportive Bridge Ltd. Any of these must be declared immediately; they are covered further in our Staff Code of Conduct Policy and our Handling Money and Property Policy.

5. Your duty to declare

- declare a conflict, or potential conflict, as soon as you become aware of it, in writing, to the Nominated Individual;
- declare it before taking part in any decision it relates to, not after;
- update your declaration if your circumstances change, for example if you start a new second job or a family member joins a company we work with;
- declare on behalf of a close family member if their interest could reasonably affect your judgement, even though the interest is not directly yours.

5.1 A declaration is not a black mark. Most declared conflicts are minor and are simply noted; declaring one early and openly is exactly what this policy asks for and protects the person who declares it.

6. How declared conflicts are managed

6.1 The Nominated Individual keeps a Register of Interests (Appendix A) recording every declaration and the action agreed. Depending on the conflict, the response may be to note it and take no further action, to have a second manager make or check the decision, to remove the individual from the decision entirely, or, in a serious case, to restrict their involvement with a particular client or person we support altogether. The Register is reviewed at each governance meeting.

7. Recruitment and procurement

7.1 Anyone involved in recruiting a candidate, awarding a shift, or choosing a supplier or contractor must declare any personal or financial connection with that candidate, worker or supplier before taking part in the decision. Where a conflict exists, a different manager makes or approves the final decision.

8. Failure to declare

8.1 Failing to declare a conflict of interest, or continuing to take part in a decision after a conflict should have been declared, is a disciplinary matter under our Disciplinary and Grievance Policy and may amount to gross misconduct, particularly where it results in unfair treatment of a person we support, a colleague, or a candidate.

9. Related policies

- Anti-Bribery and Corruption Policy
- Staff Code of Conduct Policy
- Handling Money and Property Policy
- Recruitment and DBS Policy
- Disciplinary and Grievance Policy
- Whistleblowing Policy

10. Document control

Version	Date	Approved by	Role	Reason
1.0			Nominated Individual	New policy for local authority assurance and CQC registration

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APPENDIX A: CONFLICT OF INTEREST DECLARATION

Complete and return to the Nominated Individual as soon as a conflict, or potential conflict, arises. Keep in the Register of Interests.

Name	
Role	
Date of declaration	

Describe the interest or connection, and who or what it relates to:

How could this affect, or appear to affect, decisions you are involved in?

Reviewed by	Decision / action agreed	Date

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