

Greenwich Giving

Conflict of Interest Policy

1. Introduction

Greenwich Giving is committed to integrity, transparency, and fairness in all its operations. This Conflict of Interest Policy has been developed to ensure that decisions regarding grant funding and pro-bono support distribution are made objectively, without undue influence from personal or organisational relationships.

As a place-based organisation, we expect that staff members, volunteers, members of our steering group, and members of our resident grant panels may be involved in social action, community groups, or local charities in the borough, beyond the scope of their involvement with Greenwich Giving. This grant policy sets out how Greenwich Giving looks to declare and mitigate any potential conflicts of interest that may arise from this, maintaining public trust in our governance and decision-making processes.

Greenwich Giving is currently incubated by METRO Charity, with plans for this arrangement to continue for the first three years of the initiative (2024-2027). Greenwich Giving receives practical support from METRO and both organisations work towards the mutual aim of creating positive social impact in the Royal Borough of Greenwich. However, for the purposes of grant-making, pro-bono support distribution, and community engagement, Greenwich Giving operates as an independent decision maker and organisation. This policy refers specifically to processes set up and followed by Greenwich Giving.

2. Purpose

This policy aims to:

- Define conflicts of interest within the context of Greenwich Giving's operations
- Establish procedures for identifying, disclosing, and managing conflicts of interest
- Ensure fair and equitable distribution of grants and pro-bono support
- Protect the integrity and reputation of Greenwich Giving, METRO Charity, and all associated organisations

3. Scope

This policy applies to:

- All staff members and volunteers within Greenwich Giving
- Members of the Greenwich Giving Steering Group
- Representatives from METRO Charity involved in Greenwich Giving operations
- Any individuals involved in grant decision-making processes or allocation of pro-bono support, for example, those who sit on resident grant panels in the future

4. Definition of Conflict of Interest

A conflict of interest arises when an individual's personal interests, loyalties, or connections could, or could be perceived to, influence their judgement or decision-making in their role with Greenwich Giving.

Examples include but are not limited to:

- Being employed by, or serving on the board of, an organisation who has applied for funding or requested specific pro-bono support
- Having a close personal relationship with key individuals in an applicant organisation or with individual applicants
- A staff or steering group member being a close family member of an applicant to a residents grant panel
- Having recently worked for an applicant organisation

5. Key Principles

Greenwich Giving endeavours to follow these key principles when it comes to designing and running any grant-making and resource-distribution

- **Equal Access:** All eligible organisations in the Royal Borough of Greenwich have equal access to information about grants and pro-bono opportunities
- **Merit-Based Selection:** Grant awards are determined solely on the strength of applications against published criteria
- **Transparency:** Decision-making processes are documented and can be scrutinised
- **Independence:** Decisions are made free from improper influence

6. Steering Group Membership

- The Steering Group provides strategic guidance and advice to Greenwich Giving staff as to the operations and direction of the organisation as a new charitable initiative. The Steering Group was created during the initial bid for Greenwich Giving funding combining expertise from the public, private and third sector in the borough. Opportunities to join the Steering Group will be advertised on a yearly basis and aim to involve new voices from across these sectors, with a diverse range of backgrounds and experience.
- Organisations represented on the Steering Group will not receive preferential treatment in grant or pro-bono support allocation
- Applications from organisations represented on the Steering Group will be subject to the same criteria and scrutiny as all other applications
- Where Steering Group members do sit on grant panels, they will be asked to recuse themselves from any discussion or decision-making related to their own organisations or organisations where they have a close personal connection, following the procedures detailed below

7. Procedures for Managing Conflicts of Interest

7.1 Declaration of Interests

- When any staff member, volunteer, steering group member, or panel member becomes involved in the decision-making process around grants or pro-bono support allocation (for example sitting on a grants panel or taking part in initial screening processes) they must fill in the Declaration of Interests Register (that sits at the end of this policy)
- The form will record any affiliations with community, charity or voluntary sector organisations that may apply for funding or support
- A register of these declarations will be maintained and available for inspection – Greenwich Giving will publish this document on our website
- Any changes to interests must be declared as soon as they arise, and will be added to the register

7.2 Grant Application and Review Process

- When grant applications are received, they will be initially screened by staff who have no conflicts of interest with the applicants

- Those involved in the process (staff and panel members) must proactively identify and declare any conflicts of interest related to applicant organisations
- Any person with a conflict of interest regarding a specific application must:
 - Declare the conflict before the application is discussed
 - Recuse themselves from discussions and decisions about that application
 - Not attempt to influence the decision in any way
 - Have their recusal recorded in the minutes or documentation of the decision

7.3 Pro-bono Support Allocation

Recognising that it is not practical or realistic to present every offer of pro-bono support to every charity or group in our network (or vice-versa, to present every charity request to our full roster of business contacts), Greenwich Giving still endeavours to maintain a fair and transparent process when it comes to matching corporate offers to charity and community needs.

- Wherever possible, all eligible organisations that have registered interest will be informed of pro-bono support opportunities that match with their requests
- Where opportunities may be relevant and attractive to many organisations, they will be advertised on open platforms including Greenwich Giving social media accounts and the Greenwich Giving email bulletin
- All incoming expressions of interest will be passed along to the businesses or organisation who is offering support. Where many expressions of interest have come in, Greenwich Giving will pass these on in the order that they were received, recognising that some businesses may choose to allocate resources or support on a first-come-first-serve basis
- Greenwich Giving will conduct a regular review (at least every 6 months) of which charities/community groups have received pro-bono support, to identify any groups who are making regular requests or expressions of interest that remain unfulfilled. We will consider whether they may be suffering from bias (for example against their cause, neighbourhood or service-user base) and attempt to address any inequity through active outreach on their behalf to suitable corporate partners

Some corporates, businesses and organisations will have their own preferences and priorities around who to support, restricting the role of Greenwich Giving in allocating their resource according to the above guidelines.

8. Enforcement and Consequences

- Violations of this policy may result in disciplinary action, including removal from the Steering Group, grants panel etc
- If a grant or pro-bono support is found to have been awarded in violation of this policy, Greenwich Giving reserves the right to review and potentially revoke the award
- Any concerns about conflicts of interest should be raised with the Head of Greenwich Giving (anna.ritchie@metrocharity.org.uk) or the Chair of the Steering Group (TBC)

9. Policy Review

This policy will be reviewed annually by the Steering Group to ensure it remains effective and appropriate to Greenwich Giving's operations.

9. Register of Declarations of Interest

Name/Role	Conflict of Interest declared	Mitigation
<i>Anna Ritchie, Head of Greenwich Giving</i>	<p>Employee of METRO Charity which is incubating Greenwich Giving during its pilot phase</p> <p>(METRO also holds METRO GAVS and METRO GAD, both third-sector organisations operating in the borough)</p>	<p>Any applications for pro-bono support from METRO Charity or its subsidiaries will go through the same matching process that applies to every local charity.</p> <p>Anna will not be involved in any discussions or screenings regarding funding applications that come from METRO Charity or its subsidiaries .</p> <p>Greenwich Giving will keep separate databases, information storage, and lines of communication which are not accessible to other METRO staff</p>

		members – meaning METRO will not access any potentially advantageous information which could benefit them with regards to grant applications or similar.
<i>Hannah Weber, Comms & Community Coordinator for Greenwich Giving</i>	<p>Employee of METRO Charity which is incubating Greenwich Giving during its pilot phase</p> <p>(METRO also holds METRO GAVS and METRO GAD, both third-sector organisations operating in the borough)</p>	<p>Any applications for pro-bono support from METRO Charity or its subsidiaries will go through the same matching process that applies to every local charity.</p> <p>Hannah will not be involved in any discussions or screenings regarding funding applications that come from METRO Charity or its subsidiaries.</p> <p>Greenwich Giving will keep separate databases, information storage, and lines of communication which are not accessible to other METRO staff members – meaning METRO will not access any potentially advantageous information which could benefit them with regards to grant applications or similar.</p>
<i>Mark Delacour, Steering Group Member</i>	Strategic lead for METRO GAVs and METRO GAD & Director of External Affairs for METRO Charity	Any applications for pro-bono support from METRO Charity or its subsidiaries will go through the same matching process that

		<p>applies to every local charity.</p> <p>Mark will not be involved in any discussions or screenings regarding funding applications that come from METRO Charity or its subsidiaries.</p> <p>Greenwich Giving will keep separate databases, information storage, and lines of communication which are not accessible to other METRO staff members – meaning METRO will not access any potentially advantageous information which could benefit them with regards to grant applications or similar.</p>
<p><i>Liz Cutajar, Steering Group Member</i></p>	<p>Operations and Project's Manager for Volunteer Centre Greenwich & Chair of Neutral Ground Child Contact Centre</p>	<p>Any applications for pro-bono support from Volunteer Centre Greenwich Charity, or Neutral Ground Child Contact Centre, will go through the same matching process that applies to every local charity.</p> <p>Liz will not be involved in any discussions or screenings regarding funding applications that come from Volunteer Centre Greenwich, or Neutral Ground Child Contact Centre.</p>

<p><i>Annie Drewry, Steering Group Member</i></p>	<p>Director of the Big Red Kick</p>	<p>Any applications for pro-bono support from the Big Red Kick will go through the same matching process that applies to every local charity.</p> <p>Annie will not be involved in any discussions or screenings regarding funding applications that come from the Big Red Kick.</p>
<p><i>Barrie Kelly, Steering Group member</i></p>	<p>Chief Executive Officer of Visit Greenwich</p>	<p>Any applications for pro-bono support from Visit Greenwich, or any of its subsidiaries, will go through the same matching process that applies to every local charity.</p> <p>Barrie will not be involved in any discussions or screenings regarding funding applications that come from Visit Greenwich, or its subsidiaries.</p> <p>Pro-bono and other opportunities for corporate volunteering will be advertised and offered to Visit Greenwich, if appropriate and applicable, and go through the matching process that applies to every business.</p>

<i>Ushna Mughal, Steering Group Member</i>	Senior ESG & Community Impact Lead, Knight Dragon	Pro-bono and other opportunities for corporate volunteering will be advertised and offered to Knight Dragon, if appropriate and applicable, and go through the matching process that applies to every business.
<i>Catherine Hannafin, Steering Group Member</i>	Associate Director - Inclusion and Neighbourhood Development, Royal Borough of Greenwich (RBG)	Greenwich Giving operates is an independent entity from Royal Borough of Greenwich. While Greenwich Giving benefits from the knowledge and experience of our colleagues from the council, they do not influence decision-making about where to allocate funding or pro-bono support.
<i>Cllr Sandra Bauer, Steering Group Member</i>	Cabinet Member for Equality, Culture and Communities, Royal Borough of Greenwich (RBG)	Greenwich Giving operates is an independent entity from Royal Borough of Greenwich. While Greenwich Giving benefits from the knowledge and experience of our colleagues from the council, they do not influence decision-making about where to allocate funding or pro-bono support.
<i>Abbey Sode,</i>		Greenwich Giving operates is an independent entity

<p><i>Steering Group Member</i></p>	<p>Community and Business Development Manager, Royal Borough of Greenwich (RBG)</p>	<p>from Royal Borough of Greenwich. While Greenwich Giving benefits from the knowledge and experience of our colleagues from the council, they do not influence decision-making about where to allocate funding or pro-bono support.</p>
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