



United Kingdom Association for Transactional Analysis Conflict of Interest Policy

Definition

Government guide lines define conflict of interest as “A conflict of interest between Public duties and private interests of a public member, in which the public official has private-capacity interests which could improperly influence the performance of their official duties and responsibilities”

Examples from Public Sector

- A Chief Executive taking up a government position when his former company trade with the government
- A public official sits on a board of a non profit making organisation who receives government funding
- Someone having financial gain from business interests

Why have conflict of interest policy?

- Values behind conflict of interest policy
- In line with Public sector / private business organisations
- Serving the public interest
- Supporting transparency and scrutiny
- Promotes individual responsibility and accountability to the membership
- Creates positive A-A organisational culture
-

Guidelines

6 key principles

1. Identify relevant conflicts of interest - outline and describe the circumstances and type of relationships will/may led to conflict of interests – and rationale as to why.
2. Establish procedures to identify manage and resolve Conflict of Interest situations.
3. Leadership by role modelling – monitoring.
4. Be transparent with information across organisation with developments in Conflicts of Interest - risk register.
5. Have and enforce Conflicts of Interest non-compliance sanctions.
6. Horizon gaze to potential hot spots and have strategy for this within policy.

This brief overview is taken from Organisation for Economic Co-operation and Development Government think tank and body to guide Public Sector through difficult law

Conflicts of interest for those in UKATA posts

Relational

- Client / therapist
- Therapist /supervisor
- Trainer /trainee
- Family members or partners working together on council

Influential

- Single value base for example Trainers or CTA's or Trainees only on boards/committees
- Volume influencing through focused represented on boards/committees – for example board members all from one training establishment/organisation –NHS
- External influence – through dual role ie UKCP/GMC/NMC

Business

External business interests which may lead to favouritism in contract awarding (I know a man that can! or price under-cutting using insider knowledge).

Policy for each is outlined below

Relational

For council to make explicit the route of supervision for the **role** of council members, and council business to negate the possibility of breaking council's confidentiality within the body of the organisation which may lead to conflicts of interest. For the council to strive towards having no relational conflicts within the council members

- All current relational conflicts between UKATA council members be declared, and kept confidential and lodged with the Administrator, in conjunction with the Chair. UKATA Conflict of Interest Policy January 2016
- The nominated council member then acts as a guardian of the information and enforces this Conflict of Interest Policy through bringing to the councils attention the conflict of interest

- Any relationships which are 5 years out of date remain confidential to the individual, and are not seen as a risk factor in the business of the UKATA council

Influential

For council to ensure the decision making processes are in the best interest of UKATA and the TA community through embracing the diversity of TA application. The diversity of TA is represented on each council and sub- committee. To ensure TA and UKATA members are represented fully and are the focus to decision making.

- For council and subcommittees have the appropriate skill mix to reach best outcomes to include trainees, CTA's, PTSTA's and TSTA'S (all modalities if possible).
- Aim for council and subcommittees to have no more than 30% representation from any one single organisation or trainer
- For Council and Subcommittees to identify those with dual roles
- For each council and subcommittee to publish a CoI register declaring
- status – trainee/CTA/PTSTA etc + TA field
- past / present trainer (5 year history)
- current training establishment links
- roles outside of TA – UKCP/ DR/ Nurse
- For those who hold dual roles to contribute to discussion and business of the UKATA yet have no voting rights when discussing areas of business pertinent to their dual role

Business

Council to be open and transparent in the business dealings of UKATA. To negate the possibility of fraudulent dealings, favouritism and the possibility of under hand business gain.

- For Council and Sub committees members to declare business interest
- To maintain a public list of these business interests
- For those with business interests to contribute to discussion and business of the UKATA yet have no voting rights when discussing areas of business pertinent to them
-

Time Frames

Time span is important as some of these may have lapsed previously and may reoccur. Along with this runs the confidential nature of the disclosure. Some core proposals are:

Core Proposals

- Each council member to be accountable for ensuring they self regulate on matters of this nature by declaring conflict of interest withdrawing from meetings/voting processes as necessary
- To contribute to discussion if knowledge base is required to ensure UKATA is accurate in decision making process
- That these discussions remain confidential to the council meeting and are not reported outside of the meeting to a third party
- That should a conflict of interest be known to the committee / council member that the individual member takes an abstention in the voting process

Protocol

Compliance

Each council/subcommittee member must

- Read and sign copies of the CoI policy
- Know and understand their accountability in the CoI process
- Know and understand when to withdraw from meetings/voting process
- Sign a declaration of CoI lasting a 2 year period

Non –Compliance

Each council member and each subcommittee member will be asked to report to the council formally if non compliant with the policy stating the reason why breach of policy was taken. For council to review the formal report and act according to the grievance procedure set out by Council and/or the ethical framework within TA to impose sanctions upon the breach not excluding formal enquiry and loss of UKATA membership.