



CONFLICT OF INTEREST POLICY

This policy applies to all Trustees and all staff.

Trustees have an obligation to act in the best interests of the charity and in accordance with the constitution. Staff and volunteers have similar obligations. Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of the charity.

Such conflicts may create problems they can:

- Inhibit free discussion
- Result in decisions or actions that are not in the interests of the charity
- Risk the impression that the charity has acted improperly

The aim of this policy is to protect both the Charity and the Trustees involved from any appearance of impropriety.

The declaration of interests

Accordingly, we are asking Trustees and staff to declare their interests and any gifts or hospitality received in connection with their role in the charity. A declaration of interest's form is provided for this purpose, listing the types of interest you should declare.

To be effective, the declaration of interests needs to be updated at least annually, and also when any changes occur.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the secretary for confidential guidance. Interests will be recorded on the charity register of interests, which will be maintained by the secretary. The register will be accessible by [level of access, noting any statutory requirements applicable].

Data Protection

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that Trustees and staff act in the best interests of the charity. The information provided will not be used for any other purpose.

What to do if you face a conflict of interest

If you are a user of the Charity's services, or the carer of someone who uses services, you should not be involved in decisions that directly affect the service that you, or the person you care for, receive(s). You should declare your interest at the earliest opportunity and withdraw from any subsequent discussion. The same applies if you face a conflict for any other reason. You may, however, participate in

discussions from which you may indirectly benefit, for example where the benefits are universal to all users, or where your benefit is minimal.

If you fail to declare an interest that is known to the secretary and/or the chairman, the secretary or chairman will declare that interest.

Decisions taken where a Trustee or member of staff has an interest

In the event of the Trustees having to decide upon a question in which a Member or member of staff has an interest, all decisions will be made by vote, with a simple majority required. A quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate.

Interested trustees may not vote on matters affecting their own interests. They must absent themselves from the discussion, they may participate in the discussion but not the decision-making process.

All decisions under a conflict of interest will be recorded by the secretary and reported in the minutes of the meeting. The report will record:

- The nature and extent of the conflict
- An outline of the discussion
- The actions taken to manage the conflict