



CONFLICT OF INTEREST POLICY

Reviewed by Trustees: 02/04/2020

This policy applies to trustees, staff and volunteers and should be read in conjunction with the declaration of Interests form.

Definition of conflicts of interest

Conflicts of interests may arise where an individual's personal or financial interests or loyalties conflict with their responsibility to act in the best interests of Camcycle.

Personal interests include direct interest as well as those of family, friends or other organisations a person may be involved with or have an interest in. It also includes conflict between an individual's duty to Camcycle and another duty that an individual has for example to another charity.

A conflict of interest may be actual, potential or perceived and maybe financial or non-financial.

These situations present the risk that a person will make a decision based on or affected by these influences, rather than in the best interests of Camcycle. This could bring the charity into disrepute.

Purpose of the policy

The aim of this policy is to protect both the organisation and the individuals involved from any actual or appearance of impropriety.

This policy is to guide trustees, staff and volunteers to identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of Camcycle.

After reading the policy trustees, staff and volunteers should be aware of their obligation to disclose any conflicts of interests they may have and in complying with the policy ensure they manage these in the most open way.

Policy

It is the policy of Camcycle that ethical, legal, financial or other conflicts of interest be avoided and that where conflicts do arise, they do not conflict with the obligations to Camcycle.

Camcycle will manage conflicts of interest by requiring trustees, staff and volunteers to:

- Avoid conflicts of interest where possible
- Identify and disclose conflicts of interest at the earliest possible opportunity.

The trustees will:

-Aim to ensure that all trustees, staff and volunteers are aware of their obligation to disclose any conflicts of interest and comply with this policy to ensure they are managed effectively.

-Manage any conflicts of interests reported to them to ensure the person declaring a conflict of interest can do this in a supported way and make sure the reputation of Camcycle does not fall into disrepute.

-Review the "Declaration of interests" forms at the earliest opportunity.

Identification and Declaration of Interests

Trustees, staff and volunteers must declare their interests, and any gifts or hospitality over £50 in value received in connection with their role in the charity. A "Declaration of interests" form is provided for this purpose, listing the types of interest that should be declared.

If a trustee, staff member or volunteers becomes aware in the course of a Camcycle meeting or event that they have a conflict of interest they should declare the concern at the earliest opportunity.

If a trustee, staff member or volunteer is not sure whether they have a conflict of interest they should still declare this as it is better to err on the side of caution and speak to a trustee or the Executive Director.

To be effective, the "Declaration of Interests" needs to be updated annually, and also when any changes occur.

Interests will be recorded on the charity's register of interests, which will be maintained by the Executive Director. The register will be accessible to trustees.

If and when a conflict of interest is declared or recognised the trustee, staff member or volunteer should not be involved in discussions, decisions or actions relevant to that issue are taken by Camcycle.

If and when a conflict of interest is declared with regards to managing or monitoring a contract the trustee, staff member or volunteer must not be involved in these activities.

If an individual fails to declare an interest that is known to the trustees or staff, the trustees or staff must declare the interest.

An individual may, however, participate in discussions from which they may indirectly benefit, for example where the benefits are universal to all or where the benefit is minimal.

Decisions taken where a trustee or staff member or volunteer has an interest

When deciding what action to take after a conflict of interests has been declared the trustees should:

Consider whether the conflict needs to be avoided or simply documented.

Consider whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision making.

Consider alternative options to avoid conflict.

Consider Camcycle's charitable objectives and resources.
Consider the possibility of creating an appearance of improper conduct that might impair confidence in or the reputation of Camcycle.

In the event of the trustees having to decide upon a question in which a trustee 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 the 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.

All decisions under a conflict of interest will be recorded 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.

Where a trustee benefits from the decision, this will be reported in the annual report and accounts in accordance with the Charities Statement of Recommended Practice 2005 (SPOR2005).

Independent external moderation will be used where conflicts cannot be resolved through the usual procedures.

Compliance with the Policy

If the trustees have reason to believe that a person subject to the policy has failed to comply with it, they will investigate the circumstances.

If it is found that this person has failed to disclose a conflict of interest, the trustees may take action against them. This may include seeking to terminate their relationship with Camcycle.

Data Protection

Information provided when conflicts of interests are highlighted or discussed will be processed in accordance with Camcycle's data protection policy.

Declaration of Interests Form reviewed 2020

Ias employee/Trustee/volunteer [delete as appropriate] of Camcycle have set out below my interests in accordance with the organisation's Conflict of Interest Policy.

Category	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family or some other close personal connection
Any previous employment in which you continue to have a financial interest.	
Appointments (voluntary or otherwise) eg. trustee, director, councillor, tribunal panel member, etc	
Membership of any professional bodies, special interest groups or mutual support organisations with which Camcycle has dealings	
Investments in unlisted companies, partnerships and other forms of business, major shareholdings and beneficial interests in companies which supply goods and services to Camcycle.	
Gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last twelve months.	
Any contractual relationship with Camcycle, apart from that of employer/employee.	
Membership of any group not named above which is a member of the charity.	

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed:

Position:

Date: