

**CARE International UK ('CIUK')**  
**CONFLICT OF INTEREST POLICY**

July 2019

Scope of policy:	Applies to CIUK Trustees, Committee members, Directors (Senior Management Team) and all Staff, volunteers and interns
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**Key controls:**

- Register of Interests – reviewed at each Board meeting - to record conflicts of interest, related party transactions and gifts of a value over £100
- Annual Declaration of Conflicts of Interest and Related Party Transactions; in-year declaration of gifts over £100

**Related policies and sources of guidance**

Delegated Authorities – financial approval limits  
Anti-bribery Policy

**Charity Commission guidance CC29** - Conflicts of Interest: a guide for charity trustees

CIUK requires all those who work for us (whether in a voluntary, temporary or full-time paid capacity, including Trustees and Committee members) to act in the best interests of CIUK and the CARE confederation. They must not put themselves in any position where their duties may conflict with any personal interest they may have.

Examples of conflicts of interest include:

- a trustee or member of staff being a trustee of another organisation
- paying a trustee or a closely connected company for providing a service to the charity
- an individual or company closely connected to a trustee, volunteer or member of staff responding to a tender, or being engaged to provide services to the charity

Conflicts of interest are handled using the following steps:

1. IDENTIFY conflicts of interest

- individual responsibility to declare conflicts of interest – themselves, their business interests and connected parties
- strong systems in place to identify conflicts of interest

2. PREVENT the conflict of interest from affecting decision-making

- make decisions only in the best interests of the charity
- consider the issue of the conflict of interest so that any potential effect on decision making is eliminated.

Conflicts of interest arise because a decision involves a potential benefit to the individual. Where this is the case:

- the benefit must be properly authorised:

- advance approval of trustee related party transactions over £5,000 by Board chair; declaration of all transactions through the Register of Interests
- where a conflict is identified during a procurement process, the individual must declare the interest and either withdraw from decision making or ensure their interest does not influence the decision
- the trustees, volunteer or staff member must follow any conditions attached to the authority which say how the conflict of interest should be handled
- CIUK resources must not be used to further private interests
- staff must seek explicit approval to undertake paid work for another organization. This is done through completion of a Conflict of Interest declaration for review and approval by Head of HR.

### 3. RECORD conflicts of interest

- Annual Declaration of Conflicts of Interest – mandatory for Trustees, Directors (Senior Management Team) and discretionary for volunteers and staff – using the [Conflict of Interests Declaration Form](#)
- Maintenance of Register of Interests to record conflicts of interest, related party transactions and gifts of a value over £100
- Register of Interests made available to Trustees and reviewed at each Board meeting
- Disclosure of trustee benefits (related party transactions) in the Annual Accounts

#### See Charity Commission guidance:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/636091/CC29.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/636091/CC29.pdf)

#### Key definitions:

**Conflict of interest:** a conflict of interest is any situation in which a trustee's personal interests or loyalties could, or could be seen to, prevent them from making a decision only in the best interests of the charity.

**Connected person:** in broad terms this means family, relatives or business partners of a trustee, as well as businesses in which a trustee has an interest through ownership or influence. The term includes a trustee's spouse or unmarried or civil partner, children, siblings, grandchildren and grandparents, as well as businesses where a trustee or family member holds at least one-fifth of the shareholding or voting rights.

If in doubt about whether a person or business is a connected person, seek advice from Policy owner.

**Trustee benefits:** trustees can only benefit from their charity where there is an explicit authority in place before any decision conferring trustee benefit is made. Benefits include paying a trustee, or a person or company closely connected to a trustee, for providing a service to the charity. These benefits are disclosed as Related Party Transactions in the Annual Accounts.

Policy owner: Finance Director

Policy updated: July 2019