

Conflicts of Interest Policy

1. Policy Purpose

To ensure all trustees, staff, volunteers and partners act in the best interests of Charlton Premier Skills and its subsidiaries by:

- Identifying actual, potential or perceived conflicts
- Managing conflicts transparently
- Protecting organisational integrity and reputation

2. Definition of Conflict

A conflict arises when an individual's personal interests could improperly influence their decisions or actions for the charity, including:

- **Financial interests** (e.g., owning shares in a supplier)
- **Family/personal relationships** (e.g., relative as job applicant)
- **Dual roles** (e.g., serving on another charity's board)
- **Gifts/hospitality** (e.g., valuable gifts from contractors)

3. Governance Structure

Register of Interests

- Maintained by [Governance Officer]
- Updated annually and when changes occur
- Publicly available (redacted where necessary)

Decision-Making Bodies

Conflict Type

Handled By

Staff conflicts

CEO/Senior Management Team

Trustee conflicts

Board (excluding conflicted members)

Senior leadership conflicts

Trustee Audit Committee

4. Declaration Process

When to Declare

- ✓ Annually via standard declaration form
- ✓ Before relevant agenda items at meetings
- ✓ When new interests emerge

How to Declare

1. Complete **Declaration Form** (Appendix A)
2. Submit to [Governance Officer]
3. Recorded in Register of Interests
4. Reviewed by appropriate authority

5. Management Approaches

Options for Managing Conflicts

Method	Example
Non-participation	Absent from discussion/vote
Transparent process	Disclosure to all affected parties
Third-party review	Independent assessment
Recusal	Stepping down from decision

6. Specific Scenarios

Recruitment

- Panel members must declare any relationship with applicants
- Conflicted members excluded from scoring/interviews

Procurement

- Competitive tendering required for contracts >£10,000
- Family member bids automatically disqualified

Trustee Business

- Conflicted trustees leave room during discussions
- Minutes record declarations and actions

7. Breaches & Enforcement

Consequences

- **Unintentional breaches:** Training/process improvement
- **Repeated breaches:** Removal from relevant committees
- **Serious breaches:** Disciplinary action/dismissal

Reporting Concerns

To: [Chair of Trustees]

 governance@charltonpremierskills.org.uk

Anonymous reporting via whistleblowing hotline

8. Policy Review

Annual review by Governance Committee

Last updated: 19/04/2025

Next review: 19/04/2026

Approved by:

Dennis Ssemwogerere

Director of Programmes

Charlton Premier Skills

19/04/2025

Appendices:

A. Declaration of Interest Form

B. Register of Interests Template

Related Policies:

- Code of Conduct
- Anti-Fraud Policy
- Whistleblowing Policy
- Gift Acceptance Policy

All trustees and staff must complete annual conflict of interest training.

This policy aligns with Charity Commission CC29 guidance.