

**Reviewed: June 2025**

## **CONFLICT OF INTEREST POLICY**

### **PURPOSE**

The purpose of this policy is to help board members and the leadership team of Age UK Cambridgeshire & Peterborough (AUKCAP) effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of AUKCAP and manage risk.

This policy explains the expectations we have of people who represent the charity. Their integrity, loyalty and sense of responsibility are key to the messages we convey about our organisation.

### **SCOPE**

This policy applies to board members of AUKCAP, Leadership, Management, employees and volunteers, the term "staff" will be used throughout this document to collectively refer to trustees, employees and volunteers.

### **DEFINITION OF CONFLICTS OF INTEREST**

A conflict of interest occurs when a person's personal interests conflict with their responsibility to act in the best interests of the charity. They may include direct interests as well as those of family, friends, or other organisations a person may be involved with or have an interest in (for example, as a shareholder or landlord). It also includes a conflict between a staff duty to AUKCAP and another duty that the staff member has (for example, to another charity or to funders). A conflict of interest may be actual, potential or perceived and may be 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 the charity and must be managed accordingly.

## **POLICY AND PROCEDURES**

### **1 Identification and disclosure of conflicts of interest**

Staff of the charity should consider any possible conflicts and openly report these to the Chair of Trustees or Chief Executive Officer.

Once a conflict of interest is identified, it must be entered into AUKCAP's register of interests which must be maintained by the CEO.

A review must be completed to understand the nature and extent of the conflict of interest and any steps taken to address it. The output of this review must be recorded on the register of interests and reviewed annually.

### **2 Action required for management of conflicts of interest**

#### **Conflicts of interest of board members**

AUKCAP's Board of trustees has a particular duty to ensure, while they are acting as members of the Board, that they put the interests of AUKCAP before any other interests. If a conflict of interest has been disclosed by a Board member, it must be decided whether or not the conflicted Board members should:

- vote on the matter (this is minimum)
- participate in any debate, or
- be present in the room during the debate and voting
- have access to any Board papers relating to the matter

Where a conflict is very significant or likely to prevent a Board member from regularly participating in discussions, the Board should consider if it is appropriate for the person conflicted to resign from the Board.

When considering what action to take the Board will consider:

- whether the conflict needs to be avoided or simply documented

- whether the conflict will realistically impair the disclosing person's impartiality
- alternative options to avoid the conflict
- the charity's objects and resources and
- the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of the charity.
- whether the Board member voluntarily disclosed the conflict

### **Conflicts of interest of employees or volunteers**

All employees and volunteers complete an annual declaration in which they must disclose any conflicts of interest. Once the conflict of interest has been disclosed, it must be decided whether or not the employee can:

- participate in any debate, or be present in the room during the debate
- provide advice to service users who may be connected to the conflict
- manage third party relationships
- participate in procurement or any contract negotiations

### **3 Private Work**

There needs to be clarity about the scope of the service AUKCAP is providing both for the service user and for the employee involved in the service.

AUKCAP's employees, within their contract of employment are required 'not to undertake any activity whether paid or unpaid that may compete or conflict with AUKCAP's operations'.

AUKCAP's employees should not provide a private service that is paid for to any person who becomes known to AUKCAP as a result of making use of any of the Charity's services, either at the present time or within 2 years of the service user leaving the service provided by AUKCAP.

It is not acceptable for AUKCAP's employees to use their position to take advantage of the contact and knowledge of a service user's personal details, in order to fulfil future private work. Any such

actions raise concerns about the safety and manipulation of older, often vulnerable people. Any suspicions that an employee, or parties or persons introduced by you, have intentions and plans to work privately with a service user after leaving the organisation, could result in disciplinary action.

Any unpaid services must not conflict or compete with the charity. All employees are encouraged to openly declare their involvement with any current or pre-existing service users of AUKCAP to protect the interests of all parties.

AUKCAP staff, volunteers and trustees should notify their service manager if they are proposing to engage in an outside interest that may be perceived by AUKCAP or the public as conflicting or competing with the charity.

#### **4 Compliance with this policy**

If the board or leadership team has a reason to believe that a person subject to the policy has failed to comply with it, it will investigate the circumstances. If it is found that this person has failed to disclose a conflict of interest, the organisation may take action against them. This may include seeking to terminate their relationship with the charity or could give grounds for dismissal of staff.

If a person suspects that a board member has failed to disclose a conflict of interest, they must report the matter to the chair of the Board of Trustees or CEO as soon as practicable.

#### **REVIEW**

This policy will be reviewed every 36 months.

**Conflict of Interest policy approved June 2025**

A handwritten signature in black ink, appearing to read 'Hazel Williams', with a long horizontal flourish extending to the right.

**Signed by Chair of Trustees**