



Conflict of Interest - Policy

1. Purpose

The purpose of this policy is to protect the integrity of Coodal CIC's decision-making processes and to ensure that decisions are made in the best interests of the charity. It provides guidance to trustees, staff, volunteers, and others acting on behalf of Coodal to identify, declare, and manage conflicts of interest.

2. Scope

This policy applies to all trustees, employees, volunteers, and any individuals or organisations acting on behalf of Coodal.

3. Definition of Conflict of Interest

A conflict of interest arises when an individual's interests — or interests owed to another organisation — could interfere with their duty to act solely in the best interests of Coodal.

Conflicts may be:

- **Actual** – a direct conflict exists now
- **Potential** – a conflict could arise in the future
- **Perceived** – the public or others might reasonably think a conflict exists

Examples include:

- Financial interests (e.g., contracts, grants, investments)

- Non-financial interests (e.g., personal relationships, memberships)
- Loyalty conflicts (e.g., serving on another board or charity)

4. Duty to Disclose

All individuals must declare any potential or actual conflict of interest as soon as it arises. Declarations must be made:

- At the beginning of each trustee meeting
- When a relevant situation occurs
- Annually, through a Declaration of Interests form

5. Register of Interests

Coodal maintains a Register of Interests which records all declared interests. This register is reviewed annually and updated as necessary.

6. Managing Conflicts of Interest

When a conflict is declared, the following steps will be taken:

- The nature of the conflict will be documented in meeting minutes
- The individual will withdraw from discussion and decision-making on the matter
- If appropriate, the individual may be asked to leave the room during the discussion
- A quorum must be maintained for the decision
- The remaining trustees must be satisfied that the decision is in Coodal's best interest

7. Failure to Disclose

Failure to disclose a conflict of interest may result in disciplinary action, which could include removal from the board or role within the charity.

8. Review

The board of trustees will review this policy annually and update it as needed to ensure it remains fit for purpose and compliant with Charity Commission guidance.

Approved by COODAL Board of Trustees/members on: [Insert Date]

Next Review Date: [Insert Date]
