



## CONFLICT OF INTEREST POLICY

### 1. Purpose

This policy ensures that the decisions of Inclusive United CIC are made in the best interests of our community, participants, and beneficiaries, and are not influenced by personal gain, relationships, or outside interests.

### 2. Who this applies to

This policy applies to directors, committee members, staff, volunteers, contractors, and anyone involved in decision-making on behalf of the organisation.

### 3. What is a conflict of interest

A conflict of interest arises when an individual's personal, financial, family, or other interests could influence — or appear to influence — their decisions for the organisation.

Conflicts may be:

- Direct (benefits the individual),
- Indirect (benefits a family member, business partner, or organisation they are involved with), or
- Perceived (reasonable people might think influence exists, even if it doesn't).

### 4. Duty to declare

All individuals must declare any actual or potential conflicts:

- on joining the organisation or board,
- when circumstances change, and
- at the start of relevant meetings.

Declarations should be recorded in the Conflict of Interest Register.

## **5. Managing conflicts**

Once declared, the chair (or delegated person) will decide the appropriate action, which may include:

- allowing participation where there is minimal risk,
- participation in discussion but not in decision-making, or
- asking the person to leave the discussion and abstain from voting.

No individual may use their position for personal benefit or the benefit of others connected to them.

## **6. Gifts, hospitality and bribery**

We do not tolerate bribery or improper influence in any form.

Any gifts, discounts, sponsorships, or hospitality must be declared and may only be accepted where lawful, reasonable, and proportionate.

No one may offer, give, request, or receive anything of value to secure an improper advantage, in line with the UK Bribery Act 2010

## **7. Transparency and records**

All declarations and actions taken will be minuted and kept on record. The register may be reviewed periodically by the board.

## **8. Breaches**

Failure to declare or appropriately manage conflicts may result in disciplinary action and, where relevant, reporting to regulators or funders.

## **9. Review**

This policy will be reviewed at least every two years, or sooner if required by law or best practice.

**1<sup>st</sup> September 2025 - Policy reviewed.**

**Inclusive United Community Interest Company**