



Caring and Sharing Rochdale

Conflict of Interest Policy

Conflict of Interest Policy

1. Purpose

This policy is designed to help trustees, staff, and volunteers of Caring and Sharing Rochdale (CAS) identify and handle potential conflicts of interest to ensure that all decisions are made in the best interest of the charity, its mission, and its beneficiaries. It promotes transparency, accountability, and good governance in line with the Charity Commission guidance and CAS's commitment to integrity and fairness.

2. Scope

This policy applies to:

- Trustees
- Employees (full-time, part-time, sessional)
- Volunteers
- Contractors and consultants acting on behalf of CAS

3. Definition of Conflict of Interest

A conflict of interest arises when an individual's personal interests – family, financial, professional, or otherwise – could improperly influence or appear to influence their decisions or actions within CAS.

These conflicts may be:

- **Actual** – the conflict already exists.
- **Potential** – the conflict may arise in the future.
- **Perceived** – it could be reasonably perceived that a conflict exists, even if it does not.

4. Examples of Conflicts of Interest

- A trustee awarding a contract to a relative or personal business associate.
- A staff member promoting a partner organisation they have a financial interest in.
- A volunteer advocating for a project that directly benefits a group they belong to without disclosing this relationship.
- A board member participating in decisions that could affect their employment or business.

5. Responsibilities

All individuals covered by this policy must:

- **Disclose** any potential or actual conflict of interest at the earliest opportunity.
- **Avoid** involvement in decision-making where a conflict exists.
- **Declare annually** any known interests using CAS's Conflict of Interest Register.
- **Update** their declaration if circumstances change.

6. Procedures

a. Declaration Process

- On appointment, all trustees, staff, and relevant volunteers will complete a Declaration of Interests form.
- The register will be reviewed annually and updated as necessary.

b. Managing Conflicts

When a conflict is declared:

- The individual must withdraw from any discussion or decision-making process related to the matter.
- The remaining board members or management will assess the situation and determine appropriate action.
- In some cases, a conflicted individual may be asked to leave the room during relevant discussions.

c. Documentation

- All conflicts and actions taken will be recorded in meeting minutes and the Conflict of Interest Register.
- The register will be reviewed annually by the Chair and reported to the Board.

7. Non-Compliance

Failure to disclose a conflict of interest may result in disciplinary action. Trustees found in breach of this policy could be subject to removal from the board in accordance with CAS's governing documents.


8. Review and Monitoring

This policy will be reviewed annually by the Board of Trustees or as required in response to significant operational or legal changes.

9. Related Policies

- Trustee Code of Conduct
- Whistleblowing Policy
- Governance and Risk Management Framework

- Procurement and Financial Procedures Policy

Date of this Review	Date of next Review	Policy reviewed and updated by	Policy approved by	Signature
July 2025	July 2026	Operations Manager	Board of Trustees	

Appendix A: Declaration of Interests Form

Declaration of Interests for Trustees, Staff, and Relevant Volunteers

To comply with the Conflict of Interest Policy and maintain transparency and accountability, all trustees, staff members, and key volunteers are required to declare any personal, financial, or other interests that could present an actual or perceived conflict with their duties at CAS.

Please complete the form below and return it to the Operations Manager or designated Governance Officer.

1. Personal Details

Name

Position/Role

Date of Appointment

2. Declaration of Interests

Please list all current interests, including those of your immediate family or close connections where relevant:

Type of Interest	Details	Relevant Dates (if applicable)
Employment (including self-employment, consultancy)		
Trusteeships/Directorships (current or past 5 years)		
Membership of Professional Bodies or Organisations		
Shareholdings or Financial Interests		
Contracts with CAS		
Relationships with suppliers, service users, or partners of CAS		
Other interests or loyalties that may affect impartiality		

3. Declaration

I declare that the information provided above is complete and accurate to the best of my knowledge.
I understand that I am required to:

- Update this form if my circumstances change.
- Declare any potential conflicts of interest that arise in the course of my duties.
- Comply with CAS's Conflict of Interest Policy.

I understand that failure to disclose relevant interests may result in disciplinary action.

Signature

Date

For Office Use Only

| Date Received | |

| Reviewed By | |

| Action Taken (if any) | |