Conflict of Interest Policy

Policy Statement

A Conflict of Interest is any occurrence involving REFUGEES WELCOME where the interests of a person or organisation connected to the charity conflicts with the interests of the charity. If there is a possibility of this being in the public domain, it is likely to attract negative public interest and has the potential to impact on the reputation of the charity.

We will seek to minimize the occurrence of such incidents by having a written policy to manage any Conflict-of-Interest involving Trustees, Contractors, Advisors or Volunteers. When any instance occurs, we will work to respond quickly and professionally to reduce harm and address any consequences.

Policy date: Sept 2026
By: Anne Towers Trustee
Status: final

Purpose of this Policy.

This policy sets out how the trustees of Refugees Welcome identify and manage conflicts of interest, so that decisions are made only in the charity's best interests.

What is a conflict of interest?

A conflict of interest arises when a trustee's duty, or that of any other person connected to Refugee Welcome's duty, to act in the charity's best interests competes, or may compete, with their personal interests or the interests of a person or organisation connected to them.

Any situation where there is potential for a conflict whether the conflict is active or not requires it to be declared and managed by the Trustee Board.

The trustees' legal duty

Managing conflicts is a core legal duty and as trustees of Refugees Welcome, we must make decisions based only on what is in the charity's best interests.

A conflict of interest threatens that duty because it introduces a competing interest into decisions. This policy sets out how to protect trustee decisions from being affected by a conflict of interest.

Common examples in small charities:

- A trustee's company tendering for charity work
- A trustee who is also a paid employee or a relative of one
- A trustee being a member of another organisation the charity is partnering with or funding
- Decisions about paying a trustee for goods or services.
- Volunteers being involved in other competing organisations.
- Volunteers' personal interests in conflict with Refugees Welcome 'Guidelines for Good Practice'
- Contractors having interests in competition with the remit of Refugees Welcome

Procedure:

1. Identify the conflict.

- Trustees should actively look for conflicts in their own interests outside being a Refugees Welcome Trustee and for any conflicts involving Volunteers or contractors, before making each decision. They should not wait for one to be obvious. Declaring a conflict is not an admission of wrongdoing on anyone's part but a responsible act by a trustee, volunteer or contractor, to ensure transparency. A standing agenda item at every trustee meeting is the simplest way to do this.

2. Declare the conflict.

- It is good practice for all trustees to register any interests which might conflict with the interests of the charity when being appointed as a Trustee
- Any conflicts should be on 'Register of Interests' which can be reviewed annually. Trustees should declare any new or relevant interest as soon as they become aware of it.
- Conflicts of interest for volunteers or contractors should be declared on being appointed or when this becomes obvious, by reporting it to the Trustee Board.

3. Consider removing the conflict.

- Sometimes the best option is to remove the conflict entirely — for example, by not entering any arrangement that creates a conflict.

4. Manage the conflict in Trustee meetings.

- Where the conflict cannot be removed, the board must manage it.
    - Where a trustee has a conflict of interest the trustee will not take part in the discussion.
    - They may leave the room during the discussion
    - They do not Vote on that item on the agenda.
- Serious conflicts**.**
    - Where a conflict is significant and recurring, the trustees will consider whether the arrangement causing it should be ended, or whether the trustee should step down.
- Where a conflict involves anyone other than a Trustee, a meeting should be held to explore the conflict and come to a mutual conclusion on the management of the conflict.
- If no mutual solution is agreed it may be necessary to replace a contractor or ask a volunteer to stand down

5. Record the conflict.

- The minutes must record any conflicts declared, how the conflict was managed, and the decision reached. This is the evidence that the board acted properly.

6. **Payments to trustees.**

- Any proposal to pay a trustee, or a person connected to a trustee, will follow the rules set out in the Constitution of Refugees Welcome. This should be a rare occurrence as Trustee work for charities is usually voluntary.
- Where there is a need to make a payment for goods or a service there should be a 'Service Level Agreement' setting out the limits of the service or the goods involved and ensuring that the cost is reasonable or funded externally through an agreement with a funder.
- Trustees being paid for goods or services should be a minority of the Trustee Board at any time.
- The treasurer will pay only for goods or services where there is an agreement made by the Trustee Board and the payment is authorised by Trustees in line with the Financial Accountability Policy. Or where there is an expenses claim authorised by Trustees in line with the Financial Accounting guidelines.

Review

This policy will be reviewed annually for currency and accuracy by the Chair of Trustees or individuals delegated by him/her. This does not prevent any changes taking place to this policy at any other time due to changes in practice or legislation.

Policy V1 Final

Adopted: 14.10.26

SIGNED By: N. A Campbell **DATE: 14.10.26**
[Trustee/Chair of Trustees]

POSITION in REFUGEES WELCOME: Chair of Trustees

Next Review date: Sept 2027