



Friends of Colombia for Social Aid

Registered Charity Number 274778

CONFLICTS OF INTEREST POLICY

Scope

This policy applies to all trustees, volunteers and potential employees, consultants or contractors (all “individuals”) of Friends of Colombia for Social Aid (“FOCSA”, “the Charity”) and it describes what a conflict of interest is, how and when individuals should declare it and the process for managing it and making decisions. The purpose of the policy is to establish the legal obligation of trustees, volunteers and potential employees, consultants or contractors to act in the best interest of FOCSA and to disclose any conflicts of interest that may arise. This policy aims to safeguard both the Charity and the individuals involved from any appearance of impropriety.

Introduction

Governance is overseen by the Board of Trustees, while daily operations are managed by the Executive Committee under the direction of the President of FOCSA.

Conflicts of interest may occur when an individual’s personal, business, familial or loyalty interests conflict with those of FOCSA. Such conflicts can:

- Inhibit free and open discussion;
- Result in decisions or actions that are not in FOCSA’s best interest;
- Create an impression of impropriety. Declaring and managing these conflicts appropriately ensures transparency and integrity within the Charity.

The Declaration of Interests

Trustees, volunteers and potential employees, consultants or contractors are required to declare their interests in connection with their role at FOCSA. At each Board of Trustees and Executive Committee meeting, attendees will be asked to declare any conflicts of interest arising from the business under discussion, and these will be recorded in the minutes. When in doubt about what to declare, please err on the side of caution. Declarations will be recorded in a Register of Interests, maintained by the Secretary of FOCSA, and accessible to all trustees, the President of FOCSA, and the Independent Examiner. The Register of Interests should be reviewed annually and updated whenever necessary.

Definitions

The following definitions apply to this policy:

1. Related parties

As per the latest edition of the Charities SORP (FRS 102) (published in October 2019) related parties include individuals or entities closely connected to FOCSA or its trustees, including but not limited to:

1.1. Natural persons:

- Trustees and their close family members: Any trustee and close family members, such as spouses, parents, children, siblings, and grandparents, who may influence or control decisions at FOCSA.
- Donors: Any person who has donated or bestowed gifts of any type to the Charity.
- Executive Committee members: Any member and close family members of the Executive Committee of FOCSA, who are in a position to influence decision-making.

1.2. Entities (non-natural persons):

- Controlled or influenced entities: Entities controlled or significantly influenced by individuals identified above, either directly or indirectly, such as through holding a substantial interest (e.g. more than 20% of voting rights).

2. Related party transactions

A related party transaction involves the transfer of resources, services, or obligations between FOCSA and a related party, regardless of whether a price is charged. Examples include:

- Sale or purchase of goods or property: Involving transactions where goods or property are exchanged between FOCSA and a related party.
- Provision of services: This could include consulting, legal or other professional services rendered by or to a related party.
- Donations and grants: Financial support given or received between FOCSA and related parties.
- Lease agreements: Leasing arrangements where a related party is involved, whether as a lessor or lessee.
- Financial arrangements: Loans, equity contributions, or guarantees provided to or by related parties.

3. Other examples

If the trustee is any of the following (and not limited to):

- A trustee of a related charity,
- A volunteer of a related charity,
- The owner of, or having a significant interest or association in, an organisation that supplies/may supply goods or services to the Charity,
- A local councillor, politician or political activist, or
- A local or national government official

What to do if you Face a Conflict of Interest

If you are involved in any of the following, you must declare your interest and abstain from related discussions or decisions:

- A company or organisation looking to deliver goods or services to FOCSA;
- Decisions on donations affecting entities you are connected with;
- Personal relationships with candidates for positions at FOCSA;
- Any situation where an actual or perceived conflict of interest arises. You may participate in discussions where the benefit is universal or minimal to you. If you fail to declare an interest that is known to the Chair or President of FOCSA, they may declare it on your behalf.

Decisions Taken Where a Trustee or Volunteer has an Interest

When a decision involves a trustee or volunteer with a conflict of interest, all decisions will be made by a simple majority vote. A quorum must be present, excluding the interested parties. The interested parties will not vote on the matter. All such decisions will be recorded in the meeting minutes, noting the nature of the conflict, the discussion summary, and the actions taken to manage it. If a trustee benefits from the decision, this will be reported in the annual report and accounts. Where any payment or benefit to a trustee or volunteer is involved, this must be properly authorised in FOCSA's best interests and in accordance with the Charity's financial controls policy, and appropriately recorded.

Managing Contracts

If you have a conflict of interest, you must not be involved in managing or monitoring the contract in question.

The Board of Trustees may vary the terms of this policy from time to time.

Approved by the Board of Friends of Colombia for Social Aid on 8 June 2026.

Version Control - Approval and Review

This policy will be reviewed by the Board annually, or more often if deemed necessary.

Version No	Approved By	Approval Date	Main Changes	Review Date
1.0	Board	8 June 2026	Initial draft approved	8 June 2027