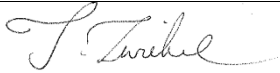


# ***Sunbeams***

## **CONFLICTS OF INTEREST POLICY**

## Document Control Sheet

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| Approved By        | Jessica Zwiebel, Safeguarding Officer and Trustee                                 |
| Signature          |  |

## Revision History

| Version | Date     | Author | Description of Change   | Approved By       |
|---------|----------|--------|---|-------------------|
| 1.0     | Sep 2019 | Admin  | Initial release outlining conflicts of interest principles.       | Board of Trustees |
| 2.0     | Sep 2020 | Admin  | Review  | Board of Trustees |
| 3.0     | Sep 2021 | Admin  | Review  | Board of Trustees |
| 4.0     | Sep 2022 | Admin  | Clarified declaration and disclosure procedures.                  | Board of Trustees |
| 5.0     | Sep 2023 | Admin  | Review  | Board of Trustees |
| 6.0     | Sep 2025 | Admin  | Minor update to register of interest's process; refreshed layout. | Board of Trustees |

## **1. Purpose**

The purpose of this policy is to protect the integrity and reputation of Sunbeams by ensuring that all decisions and actions are taken in the best interests of the charity, free from any undue influence or personal interest.

As a registered charity, Sunbeams' trustees and senior staff have a legal duty to act solely in the charity's best interests and to avoid situations where personal interests could, or could be seen to, conflict with those of the organisation.

This policy provides a clear framework for identifying, declaring, and managing conflicts of interest transparently and fairly, in line with Charity Commission guidance (CC29) and good governance practice.

## **2. Scope**

This policy applies to:

- Trustees – who are legally responsible for ensuring compliance with charity law and governance.
- Senior staff and managers – who make decisions or influence resource allocation.
- All employees and volunteers – where relevant to their role, particularly if involved in procurement, recruitment, or financial decision-making.

It also applies to family members or connected persons whose involvement could create an appearance of conflict.

## **3. What is a Conflict of Interest?**

A conflict of interest is any situation in which an individual's personal interests, loyalties, or relationships could – or could be seen to – influence their decision-making or ability to act in the best interests of Sunbeams.

Conflicts may be:

- Actual – where a direct conflict already exists.
- Potential – where a conflict could arise in the future.
- Perceived – where others may reasonably believe a conflict exists, even if it does not.

Examples include:

- A trustee or staff member who stands to gain financially or personally from a decision made by Sunbeams.

- Employing a relative or close friend.
- Awarding a contract to a company in which a trustee or their family member has an interest.
- Holding a position of authority in another organisation that competes with or collaborates with Sunbeams.
- Using information gained through Sunbeams for personal advantage.

Even the appearance of a conflict can be damaging to public confidence and must be managed openly.

## **4. Identifying and Declaring Conflicts**

All trustees, staff, and volunteers must actively consider whether they have any conflicts and declare them as soon as they arise.

Conflicts must also be declared:

- On appointment (through the induction process and declaration form);
- Annually (through the annual Declaration of Interests form);
- At the start of every Trustee or management meeting when relevant agenda items arise.

Declarations should include any interest, relationship, or benefit that could reasonably be perceived as influencing a person's judgement.

### **Connected Persons**

A conflict may also arise from a "connected person," including:

- A spouse, partner, or relative.
- A business associate.
- Any organisation in which the person or a family member holds a senior position or significant interest.

## **5. Recording Interests and the Register**

Sunbeams maintains a Register of Interests, held securely by the Director.

The Register includes:

- Trustees' and senior staff declarations of interest.
- Updates provided during the year.

- Notes on how each declared interest is managed or resolved.

The Register is reviewed annually by the Chair of Trustees and the Director and updated whenever new interests are declared.

## **6. Managing Conflicts of Interest**

Where a conflict of interest is identified, the following steps will be taken:

1. Declaration – The individual must clearly state the nature of the conflict at the start of the meeting or decision process.
2. Recording – The conflict and decision on how to manage it will be recorded in the minutes and the Register of Interests.
3. Withdrawal – The individual may be asked to leave the discussion or abstain from voting.
4. Independent decision-making – The remaining members will ensure that any decision is made only in the best interests of Sunbeams.

If there is any uncertainty about how to proceed, the matter will be referred to the Chair or to the Charity Commission for guidance.

## **7. Permitted Benefits and Authorisation**

In limited circumstances, trustees and staff may receive benefits from Sunbeams that are explicitly authorised under charity law or the Articles of Association. These include:

- Reimbursement of legitimate expenses (e.g. travel, accommodation, subsistence).
- Payment for professional services, provided this is permitted and pre-approved by the Board.
- Benefits to a trustee's connected person where authorised and demonstrably in the charity's best interests.

All such cases must be formally authorised in advance, documented in the minutes, and recorded in the Register of Interests.

## **8. Confidentiality**

All declarations and related discussions are treated as confidential. Information will only be shared on a need-to-know basis among trustees and senior management. Records will be held securely in accordance with Sunbeams' Data Protection and Confidentiality Policies.

## **9. Failure to Disclose or Manage a Conflict**

Failure to disclose a relevant interest, or to comply with the agreed management process, may constitute misconduct and lead to disciplinary or trustee action. If a serious breach occurs, it may also need to be reported to the Charity Commission in accordance with serious incident reporting procedures.

## **10. Conflicts Involving Staff and Volunteers**

Staff and volunteers also have a duty to act in the best interests of Sunbeams. Where conflicts arise:

- Staff must declare potential conflicts to their Line Manager or the Director.
- Volunteers must declare them to the Volunteer Coordinator. These will be recorded and managed using the same principles as trustee conflicts.

Staff should not be involved in recruitment, procurement, or funding decisions that could personally benefit them or a connected person.

## **11. Monitoring and Review**

The Director and Trustees review the Register of Interests annually to ensure it remains accurate.

Patterns, risks, or repeated conflicts will be reviewed to strengthen governance practice.

This policy is reviewed every two years, or sooner if legislation or Charity Commission guidance changes

## **12. Whistleblowing and Reporting Concerns**

If anyone suspects that a conflict of interest has not been declared or has been mishandled, they should raise the concern immediately using the Whistleblowing Policy.

Sunbeams will investigate concerns fairly and protect anyone who raises them in good faith.

## **13. Policy Communication and Training**

- All trustees, senior staff, and volunteers will receive a copy of this policy as part of their induction.
- Annual refresher training will be provided to ensure understanding of legal duties and reporting processes.
- All declarations will be renewed annually, and staff reminded of their responsibilities during supervision or appraisal.

## **14. Commitment to Transparency**

Sunbeams is committed to integrity, transparency, and accountability in all areas of its work.

We recognise that conflicts of interest are a normal part of charitable governance and can be managed successfully through openness and good communication.

Our shared goal is to maintain public trust and ensure that every decision supports the wellbeing of the children, young people, and families we serve.

Signed: \_\_\_\_\_

Position: Trustee

Date: \_\_\_\_\_