



## **Turtle Dove Cambridge Community Interest Company**

### **Conflict of Interest Policy**

**Reviewed: May 2025**

**Review due: May 2026**

## **Policy**

This policy applies to Directors. Directors have a legal obligation to act in the best interests of Turtle Dove Cambridge Community Interest Company (Turtle Dove), and in accordance with the organisation's governing documents and to avoid situations where there may be a potential conflict of interest.

Conflicts of interests may arise where an individual's work, personal or family interests and/or loyalties conflict with those of Turtle Dove. Such conflicts may create problems; they can:

- Inhibit free discussion
- Result in decisions or actions that are not in the interests of Turtle Dove
- Risk the impression that Turtle Dove has acted improperly.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

### **The declaration of interests**

Accordingly, we are asking Directors to declare their interest, and any gifts or hospitality offered and received in connection with their role in Turtle Dove. A declaration of interests form is provided for this purpose, listing the types of interest you should declare.

To be effective the declaration of interests needs to be updated at least annually, and when any material or specific changes occur.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the Turtle Dove Chairperson for confidential guidance.

Interests will be recorded in the organisation's Register of Interests, which will be maintained by the organisation. The register will only be accessible by Directors.

## **Data Protection**

The information provided will be processed in accordance with the data protection principles as set out in the Data Protection Act 2018. Data will be processed only to ensure that Directors act in the best interests of Turtle Dove. The information provided will not be used for any other purpose.

### **What to do if you face a conflict of interest**

If you believe you have a perceived or real conflict of interest you should:

- Declare the interest at the earliest opportunity
- Withdraw from the discussions and decisions relating to the conflict.

If you fail to declare an interest that is known, another Turtle Dove Director should declare that interest.

Any minutes relating to the item presenting a conflict should be suitably redacted for the person facing the conflict. A balance needs to be made to ensure that the person still receives sufficient information about the activities of the organisation generally without disclosing such sensitive information that could place the individual in an untenable position.

### **Decisions taken where a Director has an interest**

In the event of the Board having to decide upon a question in which a Director has an interest, all decisions will be made by vote, with a simple majority. A quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate. Interested Board members may not vote on matters affecting their own interests (and may be required to leave the room for the discussion).

All decisions under a conflict of interest will be recorded by the Secretary and reported in the minutes of the meeting. The report will include:

- The nature and extent of the conflict
- An outline of the discussion
- The actions taken to manage the conflict.

Where a Director benefits from the decision, this will be reported in the annual report and accounts. All payments or benefits in kind to Directors will be reported in the charity's accounts and annual report with amounts for each Director listed for the year in question.

Independent external mediation will be used where conflicts cannot be resolved through the usual procedures.

### **Managing contracts**

If you have a conflict of interest, you must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.

## Turtle Dove Cambridge Community Interest Company

### Director Declaration of Interests Form

I \_\_\_\_\_ as Director of Turtle Dove Cambridge Community Interest Company have set out below my interests in accordance with the organisations' Conflicts of Interest Policy.

Category	Please give details of the interest and whether it applies to yourself, or, where appropriate, a member of your immediate family, connected persons or some other close personal connection.
Current employment and any previous employment in which you continue to have a financial interest.	
Appointments (voluntary or otherwise) e.g., trusteeships, directorships, local authority membership, tribunals etc.	
Membership of any professional bodies, special interest groups or mutual support organisations.	
Investments in unlisted companies, partnerships and other forms of business, major shareholdings (more than 5% of issued capital) and beneficial interests.	
Any contractual relationship with Turtle Dove	
Any other conflicts that are not covered by the above.	

To the best of my knowledge, the above information is complete and accurate. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed: \_\_\_\_\_ (Director)

Dated: \_\_\_\_\_