IEEP UK

Conflicts of Interest Policy

Aims of the policy

The purpose of this policy sets out how IEEEP UK identifies, manages and records conflicts of interests to ensure that all decisions are made in the best interests of the charity. It supports transparency, integrity and compliance with charity law and the IEEP UK Articles of Association.

Scope

This policy applies to all Trustees, directors, employees, volunteers, and any other individuals or entities involved in the activities of IEEP UK.

What is a Conflict of Interest?

A conflict of interest arises when an individual's personal, professional, or financial interests (or those of someone they are connected to) could influence or be perceived to influence their decision-making on behalf of IEEP UK.

Conflicts may be:

- **Financial**: e.g. a trustee stands to gain from a contract awarded by IEEP UK
- **Loyalty-based**: e.g. a board member is also a trustee of a partner organisation
- **Perceived**: even if no actual conflict exists, the appearance of one can damage trust

Declaration of Interests

- All trustees and relevant staff must complete a **Declaration of Interests Form** annually and update it as circumstances change.
- Interests to declare include:
    - Employment or consultancy roles
    - Membership of other boards or committees
    - Close personal relationships with individuals or organisations connected to IEEP UK
    - Ownership or financial interest in suppliers or partners

Identifying and managing conflicts

At the start of each Board meeting, the Chair will ask for any conflicts of interest to be declared which relate to the agenda. If a conflict arises:

1. The individual must declare it as soon as they become aware.
2. The conflict will be recorded in the **Register of Interests** and meeting minutes.
3. The Board or committee will decide how to manage the conflict, which may include:
4. Requiring the individual to withdraw from discussion or decision-making
5. Transferring the matter to a sub-group without the conflicted individual
6. Seeking external advice if necessary

Restrictions and consequences

- Individuals must not accept benefits or gifts that could be seen to influence their role (see IEEP UK Gifts and Hospitality Policy).
- Failure to declare a conflict may result in disciplinary action or removal from office in line with IEEP UK's governing documents.

Oversight and Review

- The Register of Interests is maintained by the Executive Director and the Head of Finance and Operations and reviewed annually by the Finance Committee.
- This policy will be reviewed annually and updated in line with Charity Commission guidance and organisational needs.

Compliance and Enforcement

Failure to comply with this policy may result in disciplinary action, including removal from a position within IEEP UK, as deemed appropriate by the Board of Directors.

Audit Record

This document is reviewed every 3 years or as needed in response to internal or external triggers to ensure it remains current and aligned with any changes in laws, regulations, or company policies.

Version	Date	Author	Description of changes	Approved by
1	July 2025	Head of Finance & Operations	New policy created as part of operations review	

Originator Date Prepared	Louise Rose – Head of Finance & Operations July 2025
Reviewer Date Reviewed	Ben Reynolds 08/08/25
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