



## **KDDAUK CONFLICT OF INTEREST POLICY**

This policy sets out how KDDAUK will manage conflicts of interest arising from the operation of the Board of Trustees' business. KDDAUK Trustees have a legal duty to act only in the best interests of their charity. They must not put themselves in any position where their duties as trustee may conflict with any personal interest, they may have.

### **Why we have a policy**

The Board members have ultimate responsibility for all actions carried out by their members, contractors and themselves. The Board is therefore determined to ensure the KDDAUK inspires confidence and trust among its members, client/guests and suppliers by demonstrating integrity and avoiding any potential or real situations of undue bias or influence in the decision making of the Management Committee.

This conflict of interest policy respects the following Seven principles (which are those promulgated by the Nolan Committee for use in public life):

1. Selflessness
2. Integrity
3. Objectivity
4. Accountability
5. Openness
6. Honesty
7. Leadership

These Seven Principles apply to anyone who works as a public office holder including working charity organisations.

The Committee understand they have a legal obligation to act in the best interests of the KDDAUK and in accordance with their governing document – Memorandum and Articles.

KDDAUK trustees/employees/volunteers should act solely in terms of the public interest and must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work within KDDAUK and its associates.

Conflicts of interest may arise where an individual's personal, or a connected person's interests and/or loyalties conflict with those of the Board. Such conflicts may create problems such as inhibiting free discussion which could:

- Result in decisions or actions that are not in the interests of KDDA UK and
- Risk the impression that the Board has acted improperly.



### **Why we have a policy (AIM):**

The aim of this policy is to protect both the KDDAUK and its trustees and other individuals involved from any appearance of impropriety.

The KDDAUK board of trustees\ employees\volunteers \ Management \ Committee members have ultimate responsibility for all actions carried out by staff and committees throughout the organisation's activities. The board of trustees have a legal obligation to act in the best interests of KDDAUK and in accordance with KDDAUK's governing document.

### **The Declaration of Interests**

Accordingly, we ask all our Board of trustees of board members to declare their interests, and any gifts or hospitality received in connection with their role in KDDAUK . They have a personal responsibility to declare conflicts of interest in order to fulfil their legal duty to act only in the best interest of the charity .

Interests that may impact on the work of the Board and should be declared include:

- Any directorships of companies likely to be engaged with the business of KDDAUK
- Gifts or hospitality offered to members of Basingstoke Voluntary Service by external bodies and whether this was declined or accepted in the last twelve months
- Payment to a Board member and/or their organisation for a service provided to KDDAUK
- Private or personal relationships with a Contractor providing services to KDDAUK (e.g. a family member, partner), or
- Any other conflicts that are not covered by the above.

A Declaration of Interests form is provided for this purpose. To be clear, it is the potential, rather than the actual benefit from which the conflict of interest arises which requires authority.

To be effective, the declaration of interests needs to be completed prior to appointment, then **updated at least annually** or when any material changes occur. Should there be any doubt on what to declare, the Board Member should err on the side of caution.

All interest and gifts will be recorded on the Board's Register of Interests which will be maintained by the Company Secretary. This register will be accessible by all members of the Board and as per the Data Protection Act 1998, for the purposes only to ensure that the Board are acting in the best interests of KDDA UK. The information will not be used for any other purpose. Signing the Declaration of Interest form will also signify the Board Members consent to their data being processed for the purposes set out in this policy.

### **Managing Conflicts of Interests during Committee meetings**

Any trustee, who has a financial interest in a matter under discussion, should declare the nature of their interest and withdraw from the room, unless they have a dispensation to speak.



If a trustee has any interest in the matter under discussion, which creates a real danger of bias, that is, the interest affects their, or a member of their family or household, more than the generality affected by the decision should declare the nature of the interest and withdraw from the room, unless they have a dispensation to speak.

If a trustee has any other interest which does not create a real danger of bias, but which might reasonably cause others to think it could influence their decision, they should declare the nature of the interest, but may remain in the room, participate in the discussion, and vote if they wish.

## **Data Protection**

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that KDDAUK **Trustees** act in the best interests of KDDAUK. The information provided will not be used for any other purpose.

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

All conflicts of interest, whether actual or potential, should be declared promptly at the earliest possible opportunity:

- Any KDDAUK Trustee\ volunteer \ employee \ Committee member who has a financial interest in a matter under discussion should declare the nature of their interest and withdraw from the room, unless they have dispensation to speak.
- If a Trustee\ volunteer \ employee \ Committee member has any interest in the matter under discussion, which creates a real danger of bias, that is, the interest affects the KDDAUK which they represent, or a member of their household, more than the generality affected by the decision, they should declare the nature of the interest and withdraw from the room, unless they have dispensation to speak.
- If a Trustee\ volunteer \ employee \ Committee member has any other interest which does not create a real danger of bias, but which might reasonably cause others to think it could influence their decision, they should declare the nature of the interest, but may remain in the room, participate in the discussion, and vote if they wish.



- If a Trustee \ volunteer \ employee \ Committee member is in any doubt about the application of these rules, they should consult with the chairperson.
- If you fail to declare an interest that is known to the KDDAUK Secretary **or** KDDAUK Chairperson, the chairperson will declare that interest. It is recommended that Trustee \ volunteer \ employee \ Committee member interests are listed in a register

If in any doubt about the application of these rules they should consult with the chair.

### **Equality and Diversity**

We aim to be an organisation that values, recognises and responds to the diverse needs of members and those we serve. We adhere to the Equality Act 2010 and will not discriminate against any person or other organization with particular reference to the protected characteristics

### **Monitoring and Review**

The Senior Management Team, with adequate consultation of the Board of Trustees, will regularly review the operation of this policy.



## Appendix 1 of the KDDAUK Conflict of Interest Policy to be signed by all Trustees

### Declaration of Potential Conflicts of Interest

As a trustee, you are required to act in the best interests of KDDAUK. However, inevitably, trustees have a wide range of interests in private, public and professional life and these interests might, on occasions, conflict, (for example: Director of supplier or consultant to charity).

We are obliged to review any possible conflicts when preparing our annual report so ask you to supply the following details:

Name of Trustee		
Yes	No	
		Is there any relationship, either internal or external, which you feel could cause potential or apparent conflict of interest with your Board activities? If yes, please provide further details of the relationship below
		Have you performed consultancy work or engaged in any other paid work in the last year other than that which has been pre-approved?
		Do you have outside activities that involve KDDAUK?
		To your knowledge, do you or any member of your immediate family have a significant or influential relationship with (or a financial interest when aggregated for your immediate family in) any other the following:
		<ul style="list-style-type: none"> <li>• A third party that tests, markets or manufactures a product which could be evaluated or developed further through your research activities?</li> </ul>
		<ul style="list-style-type: none"> <li>• A third party, whose actions you are in a position to influence, which does business with KDDAUK?</li> </ul>
		<ul style="list-style-type: none"> <li>• A sponsor or collaborator involved with KDDAUK?</li> </ul>
		<ul style="list-style-type: none"> <li>• Any other business in which there could be a conflict of interest?</li> </ul>



		Do you hold any position or appointment as a Director (Executive or Non-executive) or Company Secretary in any company, whether or not this company does business with KDDAUK? This should have been declared on the KDDA UK Vetting of Trustees Policy already
		Are you aware of any other circumstances that could constitute a conflict of interest with your position within KDDAUK?

If you have answered 'YES' to any of the questions above, please give full details overleaf

**Signature** \_\_\_\_\_

**Date** \_\_\_\_\_

**Storage:** This document will be stored at the registered address of the charity along with legal and confidential documents.



This policy was reviewed and adopted at a General meeting of the KDDAUK held on the day of...29/09/ 2019

Print Name: Elizabeth M. Tondoneh

Signed: Tondoneh Date: 29/09/2019

**KDDAUK Treasurer Officer**

Print Name: ALAH BONDWA TONDONETA

Sign: [Signature] Date: 29/9/2019

**KDDAUK Chairman**

Witness Print Name: OPAS TAMBA JIMMY-KAY  
29/09/2019