



Sen-Active Community Glow CIC

Conflict of Interest Policy

Reviewed: 18 May 2026

Conflict of Interest Policy for Sen-Active Community Glow CIC

1. Introduction and Purpose

This Conflict-of-Interest Policy is designed to ensure that all members of Sen-Active Community Glow CIC operate with integrity and transparency. It aims to protect the interests of the organisation and maintain public trust by establishing a clear framework for identifying, managing, and recording conflicts of interest. This policy is essential in fulfilling our commitment to ethical governance and compliance with relevant legal obligations.

2. Legal Framework

As a Community Interest Company (CIC) governed by the Companies Act 2006, directors have specific statutory duties regarding conflicts of interest, which include:

- **Section 175:** Duty to avoid conflicts of interest.
- **Section 177:** Duty to declare an interest in a proposed transaction.
- **Section 182:** Duty to declare an interest in an existing transaction.

Additionally, this policy aligns with the Charity Commission guidance (CC29) on managing conflicts of interest to ensure best practices in governance.

3. Scope

This policy applies to:

- Directors/Trustees of C Sen-Active Community Glow CIC
- Volunteers in decision-making roles
- Members of sub-committees or advisory groups

4. Definition of Conflicts

A conflict of interest arises when an individual's personal interests or loyalties could potentially influence their decisions or actions within the organisation. This includes, but is not limited to:

- **Direct financial interests:** Personal financial gain from transactions or activities.
- **Loyalty to another organisation:** Obligations to other charities, businesses, or groups that may conflict with our aims.
- **Non-financial personal benefits:** Non-monetary advantages derived from the role.
- **Indirect financial interests:** Financial interests of connected persons, such as family members or close friends.
- **Loyalty to individuals:** Personal relationships that may affect impartial decision-making.
- **Competing professional duties:** Conflicts arising from professional roles in other organisations.

5. Types of Conflicts

Examples of potential conflicts include:

- A director who owns a business that could contract with Sen-Active Community Glow CIC
- A volunteer who has a family member working for a competitor organisation.
- A trustee serving on the board of another charity with overlapping interests.

6. Identifying Conflicts

Members should actively consider their relationships and interests and assess whether they could influence their role within Sen-Active Community Glow CIC. Potential conflicts should be identified during:

- Appointments/Joining of new members.
- Regular reviews of the Register of Interests.
- Discussions of relevant topics at meetings.

7. Declaring Interests

To maintain transparency, all members must declare any potential conflicts of interest through the following methods:

- **Annual Register of Interests:** All members will complete this register annually, detailing any relevant interests.
- **Declaration at Meetings:** Members must declare any conflicts at the start of each meeting.
- **Declaration on Appointment/Joining:** New members must declare any conflicts upon joining.

8. Managing Conflicts

When a conflict is identified, the following procedures will be implemented:

- The individual must withdraw from discussions related to the conflict.
- The conflict must be recorded in the meeting minutes for transparency and accountability.

The board may also consider additional steps to manage the conflict, such as seeking independent advice or resolution.

9. The Register of Interests

The Register of Interests will be maintained by Gavin Wood, who will ensure it is updated regularly. Access to the register is limited to trustees/directors only, to protect the confidentiality of declared interests.

10. Breach of This Policy

Failure to comply with this policy may lead to serious consequences, including disciplinary action or removal from the board or decision-making roles. It is essential that all members adhere strictly to this policy to uphold the integrity of Sen-Active Community Glow CIC.

11. Review

This policy will be reviewed every three years, with the next review scheduled for 18 May 2029. Any amendments will be communicated to all members to ensure ongoing compliance and effectiveness.

By following this policy, we aim to promote a culture of honesty and integrity within Sen-Active Community Glow CIC, ensuring that conflicts of interest are addressed appropriately and effectively.

Signed:

Review – May 2029