

Conflict of Interest Policy

Policy Statement:

Rotunda Ltd ("the organisation") is committed to maintaining the highest standards of ethical conduct and ensuring the utmost transparency in its operations, in accordance with its charitable objectives.

This Conflict of Interest Policy is established to ensure that the trustees (who are also directors of the company), officers, employees and volunteers of the organisation act in the best interests of the charity and its beneficiaries, in accordance with the charity's governing document, Charity Commission rules and funders' requirements; and to avoid situations where conflicts of interest may potentially arise, or appropriately manage them where they do.

Rotunda Ltd will continually strive to ensure that all conflicts of interest are identified, logged and mitigated; and that its financial and administrative processes are carried out and reported on honestly, accurately, transparently and accountably, with all decisions taken objectively and free of personal interest.

This policy outlines the procedures to identify, address, and manage conflicts of interest to maintain transparency, integrity, and public trust in the organisation's operations.

Scope: The policy applies to directors (trustees), officers, employees and volunteers involved in the management, administration and delivery of Rotunda Ltd projects/services; all of whom have a responsibility to declare any conflicts of interest that may impact on their role.

This policy sits alongside the Counter-Fraud policy.

1 Definition of Conflict of Interest:

- 1.1 A conflict of interest arises when an individual's personal, professional, or financial interests or relationships could influence, or appear to influence their ability to act impartially and in the best interests of the organisation.


2 Disclosure:

- 2.1 Duty to Disclose: All directors/ trustees, officers, employees and volunteers of Rotunda Ltd have a duty to promptly disclose any actual or potential conflicts of interest.
- 2.2 Timing of Disclosure: Disclosures should be made as soon as an individual becomes aware of any conflict of interest, whether it arises from their own interests or those of a family member, business partner, or another organisation. All directors/ trustees, officers, employees and volunteers will complete and return a COI register (Appendix 1), as a minimum, annually. The form lists the types of interest that should be declared.

- 2.3 Process of Disclosure: Disclosures should be made in writing to the Chair of the Board of Directors/ Trustees, or a designated senior staff member. The disclosure should include all relevant details about the conflict of interest.
- 2.4 Uncertainty: where an individual is unsure what to declare, or whether or when a declaration needs to be updated, they should err on the side of caution. Any issues that an individual is unsure about should, in the first instance be discussed with the Chief Executive Officer, or in their absence, with the Chair of the Board of Trustees.
- 3 Determination of Conflict of Interest:
- 3.1 Review and Evaluation: The Board of Trustees, or an appointed Conflict of Interest Committee, will review all disclosed conflicts of interest to determine if a conflict exists and to what extent it may affect the organisation.
- 3.2 Recusal: If a conflict of interest is determined, the individual involved should remove/ withdraw themselves from any decision-making processes, discussions, or activities related to the conflict. This will be enforced by the Chair of the Board of Trustees, or the designated senior staff member.
- 4 Management of Conflict of Interest:
- 4.1 Mitigation Measures: Once a conflict of interest is identified, the organisation will determine appropriate mitigation measures, which may include, but are not limited to:
- Removing the conflicted individual from discussions or decision-making processes related to the conflict.
 - Seeking an independent third-party opinion or expert advice to ensure objectivity.
 - Adjusting procedures, protocols, or policies to minimise or eliminate the conflict.
 - Establishing alternative oversight mechanisms to prevent undue influence or bias.
- 4.2 Confidentiality: All disclosures and discussions related to conflicts of interest will be treated with strict confidentiality, ensuring the privacy of individuals involved and protecting sensitive information.
- 4.3 Documentation: The organisation will maintain a record of all disclosed conflicts of interest, including the actions taken to address them.
- 4.4 Data Protection: The information provided will be processed in accordance with data protection law as applicable in England. Data will be processed only to ensure that trustees, officers, employees and volunteers act in the best interests of the Charity. The information provided will not be used for any other purpose.

- 5 Compliance and Training:
 - 5.1 Compliance: All trustees, officers, employees, and volunteers are expected to comply fully with this policy.
 - 5.2 Failure to disclose a conflict of interest or comply with the established mitigation measures may result in disciplinary action, up to and including termination or removal from the organisation.
 - 5.3 Where it is deemed that an individual has acted in their own interests to the potential detriment of others or the Charity, disciplinary action will be taken, up to and including termination or removal from the organisation.
 - 5.4 Training and Education: The organisation will provide appropriate training and education to concerned individuals to raise awareness and ensure their understanding of this policy, and the proper procedures for disclosure and management of conflicts of interest within the organisation.
- 6 Policy Review:
 - 6.1 Bi-Annual Review: To ensure its ongoing effectiveness and relevance, this Policy will be reviewed by the Board of Trustees every two years, or as a result of changes to relevant statutes. Any necessary updates or amendments will be made accordingly.
- 7 Communication of the Policy:
 - 7.1 This Policy will be communicated to all individuals associated with Rotunda Ltd, and a signed acknowledgement of receipt and understanding will be obtained from each party, by way of a completed, individual conflicts of interest form, which must be completed, even in the event of a nil return.

Rotunda Policy Review Record

Reviewed by:	Approval date:	Review frequency:	Review date:	Signed:
Maxine Ennis	11 th May 2024	Annual	12 th May 2025	

Individual Staff Member's Conflict of Interest Register

Name: _____

Position in organisation: _____

As a trustee, officer, employee or volunteer of Rotunda Ltd, I have set out below my interests in accordance with the organisation's Conflicts of Interest policy. By completing and returning this form, I confirm that I have read and understood the Conflicts of Interest Policy.

A) I have no known Conflicts of Interest to declare. (please tick if true)

OR

B) I have the following Conflicts of Interest (actual or potential):

Category	Please give details of the conflict of interest with which the conflict exists, what the interest is and whether it applies to: <ul style="list-style-type: none"> • Yourself; • A member of your immediate household, connected persons or some other close personal connection; • An organisation or company to which you are associated as an employee, director or trustee.
Current employment and any previous employment in which you continue to have a financial interest.	
Appointments (voluntary or otherwise) e.g. trusteeships, directorships, membership, etc.	
Investments in member organisations or other funded Project Delivery Partners, or other forms of business, major shareholdings or beneficial interests.	
Any other contractual relationship – either as an individual, a member of your household, or another organisation or company to which you are associated.	



Accessing a service or project delivered by Rotunda Ltd.	
Gifts or hospitality offered to you (over £50), in your capacity as a Rotunda Ltd trustee, officer, employee or volunteer - and whether this was declined or accepted in the last 12 months.	
Any Other Conflicts Not Covered by the Above:	
Managers notes:	

Signed (Trustee, officer, employee or volunteer):

Date:

Signed (Chair of the Board):

Date: