



# Conflict of Interest Policy

Gaia Education requires all those who work for the organisation (whether in a voluntary, temporary or full-time paid capacity, including Board members) to act in the best interests of Gaia Education. They must not put themselves in a position where their duties may conflict with any personal interest they may have. Gaia Education resources must not be used to further private interests.

## Key Definitions:

**Conflict of interest:** a conflict of interest is any situation in which a trustee's personal interests or loyalties could, or could be seen to, prevent them from making a decision solely in the best interests of the charity.

**Connected person:** in broad terms this is family, relatives or business partners of a trustee, as well as businesses in which a trustee has an interest through ownership or influence. The term includes a trustee's spouse or unmarried or civil partner, children, siblings, grandchildren and grandparents, as well as businesses where a trustee or family member holds at least one-fifth of the shareholding or voting rights.

**Trustee benefits:** trustees can only benefit from their charity where there is an explicit authority in place before any decision conferring trustee benefit is made. Benefits include paying a trustee, or a person or company closely connected to a trustee, for providing a service to the charity. These benefits are disclosed as Related Party Transactions in the Annual Accounts.

**Appointment conflict:** This is a conflict of interest which can arise between a charity trustee and the person or organisation which appointed them.

**Personal conflict:** When you might not be able to do what is best for the charity because it conflicts with his/her own personal or business interest in relation to that matter.

## Procedure

Conflicts of interest are handled using the following steps:

### Identification of Conflicts of Interest

- individual responsibility to declare conflicts of interest – their own, their business interests and connected parties
- strong systems in place to identify personal and appointment conflicts of interest

### Prevention of Conflicts of Interest from Affecting Decision-Making

- make decisions only in the best interests of the charity
- consider the issue of the conflict of interest so that any potential effect on decision-making is eliminated
- where a conflict is identified during a procurement process, the individual must declare the interest and either withdraw from decision-making or ensure their interest does not influence the decision

- where a conflict of interest arises because a decision involves a potential benefit to an individual, the benefit must be properly authorised by the Board in writing.

### **Recording of Conflicts of Interest**

- Annual Declaration of Conflicts of Interest – mandatory for Board Directors and Senior Management Team and discretionary for volunteers, consultants and staff
- Maintenance of Register of Interests to record conflicts of interest, related party transactions and gifts of a value over £100
- Register of Interests made available to Directors and reviewed at Board meetings
- Disclosure of Directors' benefits (related party transactions) in the Annual Accounts

### **Follow OSCR guidance:**

<https://www.oscr.org.uk/guidance-and-forms/guidance-and-good-practice-for-charity-trustees/conflict-of-interest>

Concerns related to Conflicts of Interest can be made by contacting OSCR through this page and filling a Charity Concern Form <https://www.oscr.org.uk/about-charities/raise-a-concern/>

