Conflicts of Interest Policy

United African Association

Registered Charity CIO 1192725
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www.uaassociation.org

Policy owner	Board of Trustees
Version	1.0
Approval status	Approved by the Chair
Approval date	October 2026
Next review	October 2027
Applies to	Trustees staff volunteers contractors and relevant partners

Purpose

This policy ensures decisions are made only in UAA's best interests and that personal interests, loyalties or benefits are identified and managed.

Scope

This policy applies wherever UAA works, including Barratt House, Leicester Street Community Centre, partner venues, the foodbank and food larder, community meals, welcoming spaces, youth activities, football, swimming, wellbeing sessions, allotment work, trips, outreach, home or hospital visits, online sessions, social media and transport arranged by UAA.

Legal and good practice framework

- Charities Act 2011 as amended
- Charity Commission guidance on conflicts of interest
- UAA governing document

Responsibilities

Role	Responsibility
Board of Trustees	Approves the policy, receives assurance, provides resources and remains accountable.
Chief Executive or delegated manager	Implements the policy, allocates competent leads and escalates significant matters.
Policy lead	Maintains procedures, records, training and contact details and reports themes to trustees.
Staff volunteers and contractors	Follow the policy, attend required training and report concerns promptly.

What is a conflict

A conflict may arise from a financial interest, family or close relationship, employment, trusteeship, business interest, loyalty to another organisation, gift, potential contract or personal involvement in a complaint or safeguarding matter. The appearance of bias may also damage trust and must be considered.

Declaration

Trustees and senior staff complete an annual declaration and update it promptly. Everyone declares a relevant interest at the start of a meeting or before taking part in a decision. The secretary maintains the register.

Managing a conflict

1. Identify the nature and seriousness of the conflict.
2. Follow the governing document and legal authority for any trustee benefit.
3. Exclude the conflicted person from papers, discussion, influence and voting where required.
4. Ensure the meeting remains quorate and record who left, the decision and reasons.

5. Use competitive quotes, independent advice or trustee approval where these controls are proportionate.

Trustee benefits and connected persons

No trustee or connected person receives payment or benefit unless it is authorised by the governing document, law or Charity Commission and is demonstrably in UAA's best interests. Expenses are reimbursed under the approved expenses rules and are not trustee benefits.

Persistent conflicts

Where a conflict is too serious or frequent to manage, UAA may change duties, decline the transaction or consider whether the person should resign from the relevant role.

Records and confidentiality

UAA will keep proportionate, accurate and secure records. Access is limited to people who need the information for their role. Records are retained and disposed of in line with the Data Protection and GDPR Policy and any legal, insurance or funding requirement.

Training and communication

The policy lead will include this policy in induction and arrange refresher or role-specific training where the level of risk requires it. Current procedures and reporting routes will be accessible to staff and volunteers.

Monitoring and review

The policy lead will monitor incidents, complaints, near misses, audit findings and feedback. The Board will review this policy at least annually and sooner after a serious incident, material legal or operational change, significant complaint or identified control failure.

Related UAA policies

- Financial Controls Policy
- Code of Conduct Policy
- Whistleblowing Policy
- Complaints Policy

Approval

Approved by the Chair



Raymond
Chair of UAA
Approval date: October 2026
Next review date: October 2027