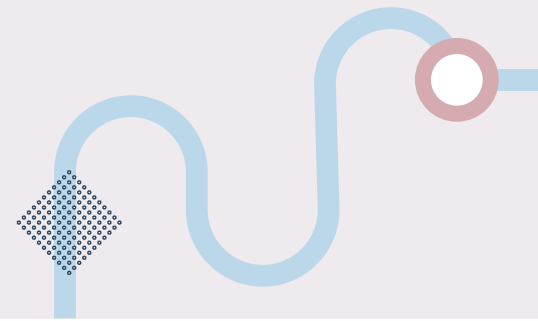


# Conflict of Interest Policy



Centre Name	
Centre Address	

Policy Name	Conflict of Interest Policy
Policy Number	
Date Created	
Effective Date Adopted by the Board	
Version Number	
Date of Last Version	
Administrator Responsible	
Administrator Contact Information	

## POLICY HISTORY

Version Number	Approved by	Revision Date	Author

## DOCUMENT CONTROL

Document Ref		Title	Conflict of Interest Policy
Version & Date		Author	
Directorate:		Approved by Management	
Reviewed		Change History	

You can fill this out on a screen using Adobe Reader [Download Here](#) or by printing.



# Conflict of Interest Policy

Enter Centre Name Here	
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## 1. PURPOSE

The purpose of this policy is to assist the directors of (\_\_\_\_\_) to effectively identify, record and manage any conflicts of interest in order to protect the integrity of (\_\_\_\_\_) and to ensure that the directors act in the best interests of the company.

## 2. OBJECTIVE

The (\_\_\_\_\_) board of directors aim to ensure that all the directors and employees are aware of their obligations to disclose any conflicts of interest that they may have, and to comply with this policy to ensure that they effectively manage those conflicts of interest as representatives of (\_\_\_\_\_).

## 3. SCOPE

This policy applies to the directors, members and employees of (\_\_\_\_\_).

## 4. DEFINITION OF CONFLICT OF INTEREST

A conflict of interest is any situation in which the personal interests or loyalties of a company's director, member or employee could, or could be seen to, prevent them from making a decision in the best interests of the company. This personal interest may be direct or indirect and could include interests of a person connected to the director, member or employee. These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the company, and therefore must be managed accordingly.

## 5. POLICY

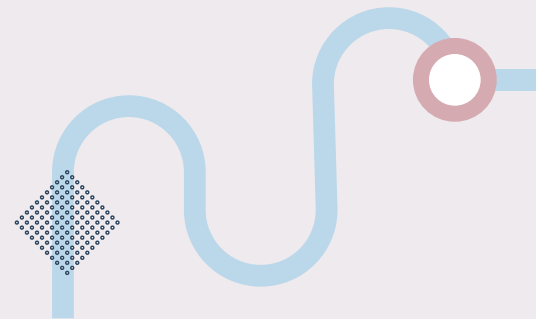
This policy has been developed because conflicts of interest commonly arise, and do not need to present a problem to the company if they are openly and effectively managed. It is the policy of (\_\_\_\_\_), as well as a responsibility of its directors, that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with their obligations to (\_\_\_\_\_).

(\_\_\_\_\_) will manage conflicts of interest by requiring directors, members and staff to:

- Avoid conflicts of interest.
- Identify and record any conflicts of interest where possible.
- Carefully manage any conflicts of interest.
- Follow this policy and respond to any breaches.



# Conflict of Interest Policy



## **5.1 Responsibility of the Board of directors**

The Board is responsible for: establishing a system for identifying, disclosing and managing conflicts of interest across the company; monitoring compliance with this policy; and reviewing this policy on an annual basis, to ensure that it is operating effectively. The company directors should ensure they are aware of their legal obligations in the management and control of their company and should refer to the guidance for company directors. For further information on this, see the Carmichael website.

<https://www.carmichaelireland.ie/courses/>

## **5.2 Identification and Disclosure of Conflicts of Interest**

Once an actual, potential or perceived conflict of interest is identified, it must be entered into \_\_\_\_\_'s Register of Interests, as well as being raised with the board of directors (standing item on board agenda). The Register of Interests must be maintained by the General Manager and record all information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it).

## **5.3 Confidentiality of Disclosures**

In order to support the board of directors, members and employees in disclosing their conflicts of interest, only the following will have access to the information disclosed: the board of directors, (x name) and the Secretary to the board. If necessary, any director, member or employee may go direct to the Chairperson as an alternative disclosure mechanism, if additional restrictions on disclosures are required in any instance.

## **6. ACTION REQUIRED FOR MANAGING CONFLICTS OF INTEREST**

### **6.1 Conflicts of Interest of members of the Board of directors or Staff**

Once the conflict of interest has been appropriately disclosed, the board of directors (excluding the disclosing individual and any other conflicted person) must decide whether or not a conflicted individual should:

- Vote on the matter (this is a minimum).
- Participate in any debate.
- Be present in the room during the debate and the voting.

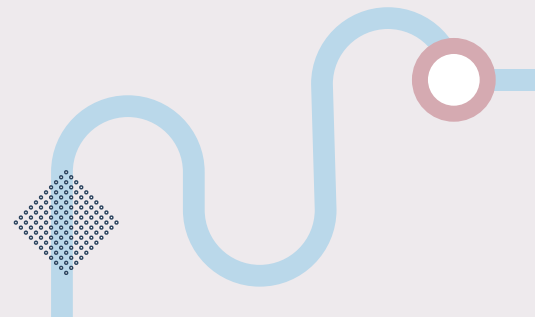
In exceptional circumstances, such as where a conflict is very significant or likely to prevent an individual from regularly participating in discussions, it may be worth the board of directors considering whether it is appropriate for the person with the relevant conflict to resign from the board or the organisation.

### **6.2 What Should Be Considered When Deciding What Action to Take**

In deciding what approach to take, the board of directors will consider whether the conflict needs to be avoided or simply documented; whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making; or whether there are any alternative options to avoiding the conflict in terms of the company's objects and resources, and the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, the company. The approval of any action requires the agreement of at least a majority of the board of directors (excluding any conflicted directors) who are present and voting (if applicable) at the meeting. All details regarding the conflict of interest, including the action arising, will be recorded in the minutes of the meeting.



# Conflict of Interest Policy



## 7. COMPLIANCE WITH THIS POLICY

If the board of directors has a reason to believe that a person subject to this policy has failed to comply with it, it will investigate the circumstances. If it is found that this person has failed to disclose a conflict of interest, the board of directors may take action against the person. This may include seeking the person's resignation from the company. If a person suspects that a director, member or employee has failed to disclose a conflict of interest, they must, discuss this with the person in question and / or notify the board of directors, or (X name / title), who is responsible for maintaining the Register of Interests.

### Contacts

For questions about this policy, contact the Board of directors or (X name / title).

