

## Trustee Conflict of Interest Policy

### 1. Purpose

This policy sets out how Llanelli Centre for the Deaf (“the Centre”) identifies, discloses and manages actual, potential or perceived conflicts of interest among its trustees.

### 2. Scope

This policy applies to all trustees and members of the board, whether appointed, elected or co-opted. It covers financial interests, personal relationships, trustee roles elsewhere, gifts and any other circumstances that might impair impartial decision-making.

### 3. Definitions

- Conflict of Interest
  - Any situation where a trustee’s personal, professional or financial interests could influence—or appear to influence—their loyalty to the Centre’s objectives.
- Related Party
  - A spouse, partner, close family member or business associate of a trustee.
- Recusal
- Withdrawing from discussion and decision-making on matters where a conflict exists.

### 4. Policy Statement

Trustees must act in the best interests of the Centre at all times. They must avoid placing themselves in situations where personal or external interests conflict—or may be seen to conflict—with those of the Centre.

### 5. Procedures

#### 5.1 Disclosure Requirements

1. Upon appointment, each trustee completes a Conflict of Interest Declaration Form (Appendix A).
2. Whenever a new conflict arises, the trustee submits an updated declaration to the Chair.

#### 5.2 Annual Declarations

1. The Company Secretary circulates a reminder and blank declaration form at the start of each financial year.
2. All trustees must reaffirm or update their declarations within 30 days.

#### 5.3 Managing Conflicts

1. The Chair reviews all declarations and flags any actual or potential conflicts.
2. For each flagged conflict, the Chair proposes one of:

- Full recusal from related agenda items and votes.
- Limited participation (e.g., discussion only, no vote).
- Risk-mitigation measures (e.g., oversight by an independent trustee).

#### 5.4 Recusal Process

1. At the start of any meeting, the Chair reminds trustees to declare conflicts related to agenda items.
2. A trustee with a conflict—actual, potential or perceived—must:
  - Declare the nature of the conflict on record.
  - Exit the meeting room (or virtual equivalent) during discussion and vote on that item.

#### 5.5 Recording and Reporting

1. Minutes record every declared conflict, the recusal decision and any mitigation steps taken.
2. The Company Secretary maintains a Conflicts Register, updated after each board meeting.

#### 5.6 Gifts and Hospitality

1. Trustees may not accept gifts or hospitality that could influence—or appear to influence—their judgement.
2. Any gift over the value of £50 must be declared to the Chair within 7 days.

#### 6. Non-Compliance

Failure to disclose or manage a conflict may lead to:

- Removal of the trustee from the relevant meeting decision.
- Referral to the full board for disciplinary action, up to and including removal from office.

#### 7. Review and Approval

This policy is reviewed biennially by the Governance Committee and approved by the full board. The next scheduled review date is June 2027.

#### Appendix A: Trustee Conflict of Interest Declaration Form

1. Trustee Name: \_\_\_\_\_
2. Date of Declaration: \_\_\_\_\_
3. Describe any personal, financial or other interests that may conflict with your duties:
  1. I confirm that to the best of my knowledge the above is complete and accurate.
1. Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Reviewed in: **2025**

