**COMMENCE CIC**  
**Conflict of Interest Policy**

**1. Introduction**  
At Commence CIC, we are committed to maintaining the highest standards of transparency, integrity, and accountability in all aspects of our governance and decision-making processes. This Conflict of Interest Policy ensures that our directors, trustees, staff, and volunteers make decisions that are in the best interests of Commence CIC, free from any personal or financial interests that might compromise their impartiality.

This policy outlines how conflicts of interest are identified, disclosed, and managed, ensuring that all decisions made by directors, trustees, and key personnel are objective and free from bias.

**2. Purpose**  
The purpose of this policy is to:

* Prevent conflicts of interest from influencing decisions made by directors, trustees, and staff.
* Ensure that any potential or actual conflicts are disclosed and managed appropriately.
* Protect the integrity of Commence CIC and maintain trust with the community, clients, donors, and stakeholders.

**3. Scope**  
This policy applies to all directors, trustees, staff, volunteers, and any other individuals who may be in a position to influence or make decisions on behalf of Commence CIC.

**4. Definition of Conflict of Interest**  
A conflict of interest arises when an individual’s personal, professional, or financial interests, or those of their close family members or associates, have the potential to interfere with their ability to make decisions impartially and in the best interests of Commence CIC.

Conflicts of interest can take various forms, including but not limited to:

* **Financial Interests**: Any situation where a director, trustee, or staff member has a financial interest in a transaction or decision involving Commence CIC, such as contracts, grants, or purchases.
* **Personal Relationships**: Situations where a director, trustee, or staff member has a close personal or familial relationship with an individual or organization that could be affected by their decisions.
* **Outside Employment or Interests**: A director, trustee, or staff member may have outside employment or interests that could influence their decisions regarding Commence CIC’s activities or operations.
* **Gifts or Benefits**: The receipt of gifts, benefits, or favors that could influence decision-making or create an obligation.

**5. Disclosure of Conflicts of Interest**  
All directors, trustees, and key staff must disclose any actual, potential, or perceived conflicts of interest as soon as they arise. This includes both direct and indirect conflicts, such as personal or financial interests held by close family members or business partners.

* **Disclosure Requirement**: At the beginning of each board meeting, all directors and trustees must declare any conflicts of interest related to items on the agenda. If a conflict arises during the course of the meeting, the individual must disclose it immediately.
* **Annual Disclosure**: All directors, trustees, and staff must complete an annual declaration form that includes disclosure of any potential or existing conflicts of interest, including family or business relationships, financial interests, or other relevant factors.

**6. Management of Conflicts of Interest**  
Once a conflict of interest is disclosed, Commence CIC will take appropriate steps to manage and mitigate the impact of the conflict on the decision-making process. The management process may involve the following:

* **Recusal**: The individual with the conflict will be required to recuse themselves from discussions, decision-making, or voting on the matter related to the conflict. In cases where the conflict relates to a decision made by the board or a committee, the affected individual will not participate in the vote.
* **Independent Review**: In cases where it is unclear whether a conflict of interest is material or how it should be handled, the board or a designated committee will conduct an independent review to assess the situation and determine appropriate actions.
* **Transparency**: The nature of the conflict and how it was managed will be documented in the meeting minutes and disclosed to the board or stakeholders as necessary to maintain transparency.

**7. Avoiding Conflicts of Interest**  
While the disclosure and management of conflicts of interest are key, Commence CIC encourages all directors, trustees, and staff to take proactive steps to avoid conflicts whenever possible. This includes:

* Avoiding situations where personal or financial interests may create the appearance of a conflict.
* Refraining from accepting gifts, favors, or other benefits from individuals or organizations with whom Commence CIC does business or interacts.
* Ensuring that decisions made on behalf of Commence CIC are based solely on what is in the best interests of the organization, rather than personal gain or external influence.

**8. Non-Disclosure of Conflicts of Interest**  
Failure to disclose a conflict of interest or to act in accordance with this policy may result in disciplinary action, including removal from the board, committee, or staff position. Serious or repeated violations may result in legal action or termination of membership or employment with Commence CIC.

**9. Conflicts in Third-Party Relationships**  
In some cases, Commence CIC may enter into contracts or agreements with third-party organizations or individuals. It is important that the organization ensures that its contractors, vendors, and other third parties are aware of and comply with our conflict of interest policy to prevent any conflicts that might arise during the course of our relationship.

**10. Gifts and Hospitality**  
Directors, trustees, and staff must not accept gifts or hospitality that could influence their impartiality or create a sense of obligation. Gifts or hospitality offered to directors, trustees, or staff must be:

* Of modest value.
* Declared and recorded in a gifts and hospitality register.
* Not given in exchange for preferential treatment or decisions.

Gifts that exceed a certain value (e.g., £50) or those that appear excessive or inappropriate must be declined or returned.

**11. Implementation and Enforcement**  
The board of directors and senior management team at Commence CIC are responsible for ensuring that this policy is implemented and adhered to by all staff, trustees, and volunteers. The board will review this policy annually to ensure it remains up-to-date and effective.

**12. Review of the Policy**  
This Conflict of Interest Policy will be reviewed annually by the board of directors and updated as necessary to ensure it reflects changes in laws, regulations, or best practices. All updates or changes to this policy will be communicated to staff, trustees, and volunteers.

**Date Adopted: 16/02/2025**  
**Signed by:** Maryam Seyad  
**Position:** Founder

**Commence CIC**