



## **Norfolk and Suffolk Animal Trust (NASAT)**

### **Trustee Conflict of Interest Policy**

Approved by: Board of Trustees

Date Approved: 26.10.2025

Next Review Due: 26.10.2026

---

#### **1. Purpose**

Norfolk and Suffolk Animal Trust (NASAT) is committed to ensuring that its trustees act at all times in the best interests of the charity. This policy aims to protect the integrity of decision-making processes, maintain public trust, and ensure compliance with legal and regulatory requirements.

It provides a framework for identifying, declaring, and managing conflicts of interest involving members of the Board of Trustees.

---

#### **2. Scope**

This policy applies to all members of the Board of Trustees of NASAT.

A conflict of interest may arise where a trustee's personal, financial, or other interests could, or could be perceived to, influence their decision-making or actions in their role as a trustee.

Conflicts may include, but are not limited to:

- Financial interests (e.g. employment, contracts, investments)
  - Personal relationships (e.g. family, friends, close associates)
  - Membership or involvement with other organisations
  - Loyalty conflicts where duties to another organisation or individual may compete with duties to NASAT
- 

#### **3. Principles**

All trustees will:

- Act solely in the best interests of NASAT.
- Avoid situations where conflicts of interest may arise where possible.

- Declare any actual or potential conflicts of interest promptly.
  - Ensure transparency in decision-making.
  - Not gain any personal benefit unless explicitly authorised and lawful.
- 

#### **4. Identifying Conflicts of Interest**

A conflict of interest occurs when:

- A trustee has a direct or indirect financial interest in a matter being considered.
- A trustee has a personal connection to an individual or organisation involved.
- A trustee's duty to another organisation could influence their decision-making.

Trustees are responsible for identifying and declaring any conflicts as soon as they become aware of them.

---

#### **5. Declaration of Interests**

##### **5.1 Register of Interests**

All trustees must complete a Declaration of Interests form upon appointment and update it annually, or whenever circumstances change.

The register will include:

- Employment and business interests
- Trusteeships or directorships in other organisations
- Significant shareholdings
- Relevant personal relationships

The register will be maintained by the Board and reviewed regularly.

---

##### **5.2 Declaration at Meetings**

At the start of each trustee meeting, trustees will be asked to declare any interests relating to agenda items.

Declarations will be recorded in the meeting minutes.

---

#### **6. Managing Conflicts of Interest**

Where a conflict of interest is identified, the Board will determine the appropriate course of action, which may include:

- The trustee taking no part in discussions
- The trustee withdrawing from the meeting for that item

- The trustee not voting on the matter
- In serious cases, the trustee stepping down from the decision-making process entirely

The level of restriction will depend on the nature and extent of the conflict.

---

## **7. Recording Conflicts**

All declared conflicts of interest and the actions taken will be clearly recorded in the minutes of the relevant meeting.

---

## **8. Failure to Declare a Conflict**

Failure to declare a conflict of interest may result in action being taken by the Board, which could include:

- Review of the trustee's position
  - Removal from specific responsibilities
  - In serious cases, consideration of removal as a trustee in accordance with NSAT's governing document
- 

## **9. Confidentiality**

Trustees must respect the confidentiality of all discussions and information accessed in their role, including matters relating to conflicts of interest.

---

## **10. Legal and Regulatory Compliance**

This policy is designed to comply with relevant legislation and guidance, including the Charities Act 2011 and guidance issued by the Charity Commission for England and Wales.

---

## **11. Monitoring and Review**

The Board of Trustees will review this policy annually to ensure it remains effective and up to date with legal and regulatory requirements.

---

## **12. Contact for Advice**

If trustees are unsure whether a conflict of interest exists or how it should be managed, they should seek advice from the Chair of Trustees.

