



Conflict of Interest Policy

How trustees declare and manage conflicts of interest and loyalty, with the Register of Interests template.

Document	1.3 Conflict of Interest Policy
Organisation	Brick's Foundation for Autism Inclusion - In Loving Memory of Lucca Lacerda Tavares
Legal structure	Charitable Incorporated Organisation (CIO), Foundation model, principal office in England
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1. Why this matters

Trustees must act only in the best interests of Brick's Foundation. A **conflict of interest** happens when a trustee's personal interest, or the interest of someone close to them, could affect, or look as if it affects, their decisions for the charity. A **conflict of loyalty** happens when a trustee's duty to another organisation, employer or person could do the same. Conflicts are normal and not wrong in themselves; what matters is that they are declared and managed. Clause 7 of the constitution requires this.

2. Who this covers

All trustees. Volunteers and award assessors follow the same principles for decisions they take part in.

3. Examples relevant to us

- A trustee is connected to an organisation that is nominated for, or applies for, a Brick's Foundation Award or the Inclusion Award.
- A trustee works for, leads or volunteers with a partner organisation that the Foundation recommends people donate to.
- A trustee's employer is featured or recognised by the Foundation.
- A trustee, or a family member, would supply a service to the Foundation.
- Family relationships between trustees, or between a trustee and someone the Foundation recognises.

4. What trustees must do

1. **Declare** interests when they join, every year, and whenever something changes, using the Trustee Declaration (1.4). They are recorded in the Register of Interests.
2. **Declare at meetings:** "Declarations of interest" is the first item on every agenda. Declare any interest in an item, even if it is already on the register.
3. **Step out:** a trustee with a conflict leaves the discussion of that item, does not vote and does not count in the quorum (clause 7).
4. **Do not influence** the decision outside the meeting either.

5. How the Board manages a conflict

The trustees who are not conflicted decide how to manage it, record their decision in the minutes, and may:

- ask the trustee to leave the discussion and decision (the usual approach);
- in rare cases, decide the conflict is so serious that the activity should not go ahead, or the trustee should step down from a role;
- seek advice from the Charity Commission where needed.

No trustee or connected person may receive any benefit from the charity unless clause 6 of the constitution allows it.

6. Awards and recognition

Award decisions must be fair and seen to be fair. A trustee connected to a nominee or applicant never assesses or decides that award. Where a trustee's own organisation is recognised, the minutes record the connection and that the trustee stepped out.

7. Gifts and hospitality

Trustees declare any gift or hospitality worth more than about £25 received because of their role. Gifts are never accepted in return for recognition or awards.

8. Breaches

Failing to declare a conflict is a serious matter. The Board will review the decision affected, and may take further action. Serious breaches may be reported to the Charity Commission.

Register of Interests (template)

Trustee	Interest or relationship	Type (financial, loyalty, family)	Date declared	How managed

The completed register is kept by the Board of Trustees in the Governance folder, reviewed at every meeting and updated at least once a year. A copy is available to anyone on request to aloisio.tavares@bricksfoundation.co.uk.

Version history

Version	Date	Approved by	Summary
1.0	21 October 2026	Board of Trustees	First version, written for Brick's Foundation and adopted by the trustees.