

---

Conflict of Interest Policy

---

Turas Training

---

Approval date: July 2022

---

Revision date: July 2024

---

## **Conflict of interest policy**

### **1. Purpose**

The purpose of this policy is to assist charity directors of Turas to effectively identify, record and manage any conflicts of interest in order to protect the integrity of Turas and to ensure that the charity directors/trustees act in the best interest of the charity.

### **2. Objective**

The board of management aims to ensure that the directors are aware of their obligations to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest.

### **3. Scope**

This policy applies to the directors of Turas Training CLG.

### **4. Definition of conflicts of interests**

A conflict of interest is any situation in which a director's personal interests or loyalties could, or could be seen to prevent the director from making a decision in the best interests of the organisation. This personal interest may be direct or indirect, and can include interests of a person connected to the director. 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 organisation 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 organisation if they are openly and effectively managed. It is the policy of Turas 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 the organisation.

Turas will manage conflicts of interest by requiring directors to:

1. avoid conflicts of interest where possible
2. identify and record any conflicts of interest
3. carefully manage any conflicts of interest, and
4. follow this policy and respond to any breaches.

#### **5.1 Responsibility of the board of charity trustees**

The board is responsible for:

1. establishing a system for identifying, disclosing and managing conflicts of interest;
2. monitoring compliance with this policy; and
3. reviewing this policy on an annual basis to ensure that the policy is operating effectively.

Directors should ensure they are aware of their legal obligations in the management and control of their charity and should refer to the Charities Regulator's 'Guidance for Charity Trustees' for further information visit [www.charitiesregulator.ie](http://www.charitiesregulator.ie)

#### **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 Turas's register of interests [using the Register of Interests Form], as well as being raised with the board of directors. The register of interests must be maintained by the company secretary, and it should 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).

### **Confidentiality of Disclosures**

In order to support the directors to disclose their conflicts of interest, the level of confidentiality associated with any disclosure should be set out:

1. The register will be stored securely under the responsibility of the company secretary
2. The register of interests will be accessible by all directors by request
3. The register will be reviewed regularly and additional interests can be added at any time.

## **6. Management of Conflicts of interest**

### **6.1 Conflicts of Interest of Directors**

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

1. vote on the matter (this is a minimum),
2. participate in any debate, or
3. 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 a director from regularly participating in discussions, the board may consider whether it is appropriate for the person with the relevant conflict to resign from the board.

### **6.2 What should be considered when deciding what action to take:**

1. In deciding what approach to take, the board will consider whether the conflict needs to be avoided or simply documented
2. whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
3. alternative options to avoid the conflict
4. the charity's objects and resources, and
5. the possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, the charity.

The approval of any action requires the agreement of at least a majority of the board of directors (excluding any conflicted director) 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.

## **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 actions up to and including seeking the person's resignation from the charity.

If a person suspects that a director has failed to disclose a conflict of interest, they must discuss these concerns with the person in question if appropriate or with the chair.