WE CREATE UNITY CIC

Conflicts of Interest & Related-Party Transactions

Stronger Together. Better Communities.

Organisation	We Create Unity CIC
Company number	16541073
Registered office	34 The Market Square, London, England, N9 0TZ
Organisation type	Community Interest Company
Version	1.0
Reviewed	October 2026
Review cycle	At least annually and when material legal or operational changes occur

1. Purpose

WCU directors and workers may have outside roles in music, education, youth work and local partnerships. Interests are not automatically prohibited, but must be declared, managed and evidenced so decisions advance WCU's community purposes.

2. Register and declarations

Maintain a register covering employment, directorships, consultancy, family connections, financial interests, suppliers and partnerships. Require annual declarations and agenda-specific declarations before decisions. Update the register when circumstances change.

3. Decision procedure

Record the nature of the interest, whether the person left the discussion, whether they voted, quorum considerations, independent comparison of options and the final rationale. Follow the Companies Act 2006, WCU Articles and any funder conditions; conflicted directors must not authorise their own benefit contrary to applicable rules.

4. Director remuneration and procurement

Directors may undertake genuine paid delivery roles only where permitted, properly authorised, reasonably priced and supported by contracts, timesheets or outputs. Benchmark rates, document selection and avoid splitting purchases to circumvent approval limits. Any related-party transaction must be transparently recorded.

5. Partnership and employment overlap

When a director works for a potential commissioner, school, local authority or delivery partner, confirm external employer permissions and procurement rules. Do not use confidential employer information or imply authority to award contracts. Declare conflicts before negotiating or approving agreements.

6. Monitoring and breaches

The Board reviews the register at least annually and on material transactions. Suspected undeclared interests are investigated impartially, decisions may be reconsidered and remedial action documented.

7. Scope and responsibility

This policy applies to directors, employees, contractors, sessional workers, volunteers and representatives acting for WCU, including online activity and delivery with partners. The Board is accountable for implementation; a named policy lead will coordinate operational arrangements.

8. Implementation and assurance

All relevant personnel will receive induction appropriate to their role, confirm that they have read this policy, and report concerns or breaches promptly. The Board will review implementation, record significant decisions and ensure corrective actions are followed up.

9. Review and implementation

This policy will be considered at the next WCU governance meeting and reviewed at least annually, or sooner following material operational or legal changes. Directors should record interim adoption and any subsequent amendments in meeting minutes. The review date above must be confirmed against the organisation’s actual review records.