

Conflicts of Interest Policy

1. Purpose

The Walrus Cruise is a Christian charity committed to acting with integrity, transparency and good stewardship. This policy sets out how conflicts of interest are identified, declared and managed, so that decisions are made in the best interests of the charity and those it serves.

The purpose of this policy is to:

- protect the charity, its Trustees and Leaders;
- ensure that decisions are made fairly and without improper influence;
- comply with Charity Commission expectations of good governance.

2. What Is a Conflict of Interest?

A conflict of interest arises where an individual's personal interests, loyalties or responsibilities could influence, or be seen to influence, their decision-making on behalf of The Walrus Cruise.

Conflicts may be:

- **Financial**, such as where an individual or a close connection may gain financially;
- **Personal**, such as family relationships or close friendships;
- **Loyalty-based**, such as obligations to another organisation;
- **Perceived**, where no actual conflict exists but a reasonable person might think there is one.

Conflicts may be actual, potential or perceived.

3. Who This Policy Applies To

This policy applies to all those involved in the governance and leadership of The Walrus Cruise, including:

- Trustees;
- the Commodore and other senior Leaders;
- individuals involved in decision-making on behalf of the charity.

4. Examples of Conflicts

Examples of conflicts of interest include, but are not limited to:

- involvement in decisions affecting a family member or close friend;
- financial interests in suppliers, contractors or service providers;
- personal benefit from charity decisions, including preferential treatment;
- holding a role in another organisation whose interests overlap or conflict with those of The Walrus Cruise.

5. Declaration of Interests

All Trustees and those in senior leadership roles are required to:

- declare any actual or potential conflicts of interest;
- update their declaration if circumstances change;
- declare conflicts at meetings where relevant matters are discussed.

Declarations should be made openly and promptly.

6. Register of Interests

The Walrus Cruise will maintain a Register of Interests, recording declared conflicts.

The Register will:

- be reviewed periodically;
- be available to Trustees;
- be used to support transparent decision-making.

7. Managing Conflicts

Where a conflict of interest arises:

- the conflict must be declared;
- the nature of the conflict should be recorded;
- the individual concerned must not take part in decision-making on that matter;
- where appropriate, the individual may be asked to withdraw from discussion.

The remaining decision-makers must be satisfied that decisions are made in the best interests of the charity.

8. Serious or Ongoing Conflicts

Where a conflict is serious or ongoing, the Trustees may:

- seek independent advice;
- impose conditions or restrictions;
- require the individual to step aside from a role or decision;
- determine that the conflict cannot be adequately managed.

Such decisions will be made carefully and proportionately.

9. Recording Decisions

All declarations of conflict and the steps taken to manage them must be recorded in meeting minutes or other appropriate records.

This provides transparency and protects both individuals and the charity.

10. Failure to Declare a Conflict

Failure to declare a conflict of interest may undermine trust and confidence.

Where a failure to declare is identified, the Trustees will consider appropriate action, which may include review of decisions taken or further governance steps.

11. Christian Approach to Conflicts

In line with Christian teaching, those involved in The Walrus Cruise are expected to act honestly, humbly and with integrity.

Declaring a conflict of interest is a sign of good stewardship and faithfulness, not wrongdoing.

12. Review of This Policy

This policy will be reviewed periodically, and at least every three years, or sooner if required by changes in law or guidance.

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