

CONFLICT OF INTEREST POLICY

Transparency. Independence. Fair Decisions.

Right First Time UK Ltd | Company number 17493370 | Version 1.2

Updated: 12 October 2026 | **Previous policy date:** 16 June 2026 | **Review:** at least annually

A conflict does not automatically mean wrongdoing. Declare it early, manage it fairly and record the decision.

Our central rule: disclose a relevant interest before the decision, have it considered by someone suitably unconflicted, and record the management decision. Lawful political views alone do not disqualify a person from RFTUK.

1. Purpose and who this applies to

Right First Time UK Ltd (RFTUK) seeks independent, fair and evidence-led decisions. This policy explains how interests that might affect impartiality are identified, declared, recorded and managed. A conflict is not automatically wrongdoing; concealing or mishandling one creates the risk.

It applies according to responsibilities to the Founder, Directors, Campaign Leaders, Campaigners, Volunteers, staff, advisers, contractors and anybody acting with delegated decision-making authority for RFTUK. Ordinary Members, Subscribers and supporters do not need general annual declarations simply for supporting RFTUK, but must disclose a relevant interest when taking part in a particular decision.

2. Recognising conflicts

An actual conflict exists now; a potential conflict may arise later; a perceived conflict is one an informed, reasonable observer could think may affect impartiality, even without improper conduct. Each deserves proportionate consideration.

Relevant interests can include family or personal relationships, employment, shares, outside directorships, suppliers, contracts, political roles, campaign affiliations, donations, sponsorship, grants, gifts, litigation, complaints, professional duties and opportunities gained through RFTUK.

Only information relevant to the decision should be requested. Disclosure should not become an unnecessary demand for private details.

3. Directors and legal duties

Directors must meet their Companies Act 2006 duties, including independent judgement; acting within powers; managing conflicts of interest; not improperly accepting benefits from third parties; and declaring interests in proposed or existing company transactions when legally required.

RFTUK rules supplement, rather than replace, statutory duties and its Articles of Association. A title such as Founder does not remove a Director's legal responsibilities.

4. Political independence and lawful participation

RFTUK is non-party-political and campaigns on issues, laws, public services and accountability. A person's lawful political-party membership or beliefs do not automatically prevent them joining RFTUK. Their interest must be considered in relation to the particular campaign or decision.

When acting for RFTUK, participants must not turn its website, email lists, events, funds or campaigns into party recruitment, candidate promotion, party fundraising, election advertising or instructions telling people how to vote. Party relationships must not give outsiders control over RFTUK evidence, findings or priorities.

Accurate public-interest reporting, scrutiny, criticism, praise or quoting a politician or party is not automatically party promotion. Personal political activity must be clearly separate from official RFTUK activity.

5. Elections and relevant political interests

A political connection should be declared when a person has an office, candidacy, campaign role or loyalty that could influence a particular RFTUK decision, including spending, publications, partnerships or access.

Before significant election-period or referendum activity, RFTUK should check whether the non-party campaigning purpose test, spending controls, donation rules, registration or digital-imprint duties apply. Being issue-led does not by itself exempt an activity from electoral law. Current Electoral Commission guidance should be checked.

6. When to declare

Directors and people taking significant decision-making roles should declare relevant interests when appointed. Directors should review or confirm their declarations at least annually; other recurring decision-makers may be asked to do likewise.

Everyone covered by this policy should declare a new relevant interest promptly, ideally before the decision or meeting. If discovered during a discussion, it should be raised at once. An annual declaration does not replace this duty to speak up.

7. Internal register and privacy

RFTUK should maintain an internal Conflict of Interest Register recording proportionately: the person and role, nature of the interest, affected decision, date declared, whether actual/potential/perceived, management steps, decision-maker and review date where appropriate.

The register is not automatically public. Family, financial, political, medical, security and other personal details should be restricted to those who need them. Public summaries may be appropriate for significant governance conflicts, without unnecessary disclosure of personal information.

8. How conflicts are managed

An authorised, appropriately unconflicted person should assess the interest, the affected decision, likelihood of influence, seriousness and public perception. Record both the action taken and why it was proportionate.

- Record the interest and allow participation where the risk is low and manageable.
- Request further disclosure, independent advice or evidence.
- Restrict access to confidential information or particular tasks.
- Exclude the person from discussion, assessment, approval or voting where needed.
- Transfer the decision to unconflicted people; restructure or decline a transaction.
- Review or end delegated authority where a conflict cannot be managed fairly.

9. Board meetings, quorum and approvals

A materially conflicted Director must be managed in accordance with the Companies Act and RFTUK's Articles. Whether they may vote or count towards a quorum depends on the relevant legal and constitutional rules; authorisation of certain conflicts may be possible only where those rules permit it.

Board minutes or written resolutions should record the interest, any exclusion or authorisation, who participated and the reasons for the decision. If there are too few unconflicted Directors, seek the lawful route under the Articles, including Member decisions or suitable advice where necessary.

10. Payments, expenses and connected contracts

Nobody should improperly approve their own remuneration, unusual expense or connected transaction. Genuine authorised expenses may be reimbursed, including for unpaid voluntary roles. Paid posts or Director remuneration must be lawful, properly approved, documented and consistent with the Articles and available resources.

Anyone affecting procurement, purchasing, contracting or supplier choice should disclose close family, employment, ownership or other relevant links. Connected-person contracts are not automatically prohibited, but must be necessary, reasonable, properly authorised and independently assessed where appropriate.

11. Donations, sponsorship, gifts and hospitality

A donation or sponsorship cannot buy control of a campaign, evidence, findings, decisions or criticism. Significant support from someone directly affected by an RFTUK decision should be assessed and may be declined, limited or returned.

Do not seek or accept gifts, hospitality, discounts or benefits that could reasonably appear to affect RFTUK work. Significant, repeated or decision-linked offers must be declared. Directors must also comply with their statutory duty concerning benefits from third parties.

12. Grants, recruitment and partnerships

Decision-makers must declare relevant links to applicants, grant recipients, charities, community projects, partners or other groups. Materially connected people should normally stand aside from selecting, awarding or approving support, with an independent check where feasible.

RFTUK may work with public bodies, businesses, charities, campaign groups and political representatives where doing so supports its aims. Agreements must make responsibilities, funding, public statements, safeguarding and data handling clear; outside relationships must not dictate findings or conclusions.

13. Complaints, safeguarding and investigations

A person should not investigate or determine a complaint about their own behaviour. Family, friendship, business, political or opposing interests must be assessed and managed; outside or independent input should be considered if no suitable internal reviewer is available.

Safeguarding decisions must prioritise safety and lawful referrals, not the reputation of a person, campaign or partner. Evidence reviewers must declare interests that might affect analysis, and must not change findings to favour or protect anyone.

14. Information, opportunities and access

People acting for RFTUK must not use confidential records, donor information, case evidence, contacts, contracts, system access or opportunities acquired through their role for private gain or to benefit a connected person or organisation without proper authority.

Disclosure of a conflict does not authorise sharing confidential information. Data access must remain role-based and consistent with privacy and cybersecurity policies.

15. Volunteers, Campaign Leaders and other roles

Volunteers and Campaigners declare interests relevant to their assigned tasks; they should not have to catalogue unrelated private affairs. A conflict may be managed through reassignment rather than excluding a person entirely.

Campaign Leaders must consider conflicts when selecting evidence reviewers, managing funds, allocating sensitive tasks or representing RFTUK. Contractors and advisers should disclose relevant competing interests in their work, including other clients where appropriate.

16. Failures to declare and later discoveries

A missed declaration does not automatically establish corruption. Deliberate concealment, repeated refusal, self-approval or misuse may justify correction of records, independent reassessment, access restrictions, removal from a decision or role, contractual/governance action, or lawful external referral.

When a conflict is discovered after a decision, RFTUK should assess whether the process and outcome remain lawful and fair. The matter may need fresh approval, reconsideration, an independent review or correction of public information.

17. Raising concerns and protection from retaliation

People should feel able to raise genuine concerns about undisclosed interests, favouritism, improper influence or misuse of funds. RFTUK should not retaliate against a person for a good-faith report, even where the concern is not ultimately upheld.

Where practical, someone not personally involved should review the concern. Intentionally fabricated or malicious allegations may be dealt with separately, but a rejected concern is not automatically malicious.

18. Parent Contribution Service (PCS)

PCS is a service operated by Right First Time UK Ltd, not a separate company merely because it uses the PCS name. Under the current model, PCS supports voluntary parent-to-parent arrangements and related records; it does not itself receive, hold or transfer parent-to-parent contribution funds or exercise statutory enforcement powers.

A person handling PCS administration, complaints, payment records or access decisions must declare a family, financial, personal or professional connection to a parent or child where it could affect fairness. An appropriately unconflicted person should manage the decision where needed.

19. Related policies and official guidance

Read this policy alongside the Articles of Association; Governance & Transparency; Volunteer Policy; Campaign Leader & Campaigner Code; Lobbying & Political Independence; Financial Controls & Expenses; Fundraising; Safeguarding; Complaints; Speaking Up; Data Protection; and Evidence, Publication & Corrections policies.

- [GOV.UK: company directors' general duties](#)
- [Companies Act 2006: section 175 \(conflicts\)](#)
- [Companies Act 2006: section 177 \(interests in proposed transactions\)](#)
- [Electoral Commission: non-party campaigners](#)

20. Contact, accountability and review

Questions, declarations and concerns about conflicts can be submitted through the RFTUK Contact Us page. Complaints about how RFTUK handled a conflict may also be raised using its Complaints Policy.

- [Contact Right First Time UK](#)

RFTUK will review this policy at least annually and sooner where governance, political campaigning, procurement, funding, partnerships or the law materially change. Previous policy date: 16 June 2026. This revision: 12 October 2026.

Company and legal details

Right First Time UK Ltd | Company no. 17493370 | Private company limited by guarantee, without share capital | Non-profit operating basis.

Official website: <https://rightfirsttimeuk.com/>

Contact Us: <https://rightfirsttimeuk.com/contact-us.php>