



**E-mail****Attachment**

**From**  Van Der Pas, Sara **Cc**

**To**  CCD **Substantive Query** No **Substantive Query**  
Email Team **– SF not applicable**

**Bcc**

**Title** The Global Warming Policy Foundation: charity number 1131448  
**Subject** The Global Warming Policy Foundation: charity number 1131448

Dear Sirs

Please find attached a letter and enclosures in respect of the above-named charity.

Yours faithfully

Farrer & Co LLP

<<Letter 28 October 2009.pdf>> <<FARDM1-#1351171-v1-Standard\_conflict\_of\_interest\_policy.pdf>>

**Sara van der Pas****Solicitor**

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**Regarding**  C-274537-A703 : THE GLOBAL WARMING POLICY FOUNDATION : 1131448

<b>Owner</b>	 Edwards, Mark	<b>Compliment</b>	<b>Informal Complaint</b>
<b>Importance</b>	Normal	<b>Modified On</b>	24/11/2009 10:19 AM
<b>Reason</b>			

**Risks & Targets**

<b>Risk Rating</b>	Green	<b>Blue Type</b>	<b>Possible risk factors 1</b>
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<b>Target Date</b>		<b>Possible risk factors 2</b>
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<b>Local Target Date</b>	04/11/2009	<b>SF Target Date</b>	18/11/2009	<b>Critical Response Date</b>
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<b>Executive/Director/Board</b>	<b>MP Correspondence</b>	<b>Evidence</b>
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**Hidden Fields**

<b>Created On</b>	28/10/2009 2:33 PM	<b>CCD Show Tab</b>	Yes
<b>Direction</b>	Incoming	<b>Subject Hidden</b>	The Global Warming Policy Foundation: charity number 1131448
<b>Status Reason</b>	Completed	<b>Sender Email</b>	scv@farrer.co.uk
<b>Activity Status</b>	Completed		
<b>Restricted Case</b>	No	<b>Restricted Case User Ids</b>	
<b>Last Queue ID</b>	{6261D3B8-0560-DE11-B992-02BF0A6F6464}		

**Other Information****Amendments**

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<b>CoC request</b>	<b>Data Extract request</b>	<b>REM</b>
<b>FOI Request</b>	<b>Signposted</b>	<b>Trustee Amendment</b>
<b>Complaints about charity</b>	<b>Intelligence informed</b>	<b>Email Amendment</b>
<b>Data Accuracy Amendment</b>	<b>Response to CC consultation</b>	<b>Compliments Received</b>

**E-mail Queue Details**

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<b>First Queue</b>	CCD Email Team	<b>Last Queue</b>	RTN Registration Applications
<b>First Entered</b>	28/10/2009 14:33:01	<b>Modified On</b>	

**CCD Details**

<b>Topic</b>	Registration	<b>Subtopic</b>	
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**Outcome**

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<b>Outcome</b>	Allocated	<b>Outcome Date</b>	28/10/2009
<b>Allocated To</b>	Registration	<b>Signposted To</b>	
<b>Queue Name</b>	CCD Email Team	<b>Signposted To</b>	
<b>Outcome Risk Assessment</b>	Green	<b>Entered On</b>	28/10/2009 14:33:08

**Powers****Powers used**

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**Powers requested and declined**

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**Attachments**

File Name	File Size
FARDM1-#1351171-v1-Standard_conflict_of_interest_pol...	140,607
Letter 28 October 2009.pdf	30,243

**Notes**

Notes

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# FARRER & Co

Charity Commission Direct  
PO Box 1227  
Liverpool  
L69 3UG

Our reference JAS/SCV/at  
Direct telephone 020 7917 7306  
Direct facsimile 020 7242 9899  
Direct email [scv@farrer.co.uk](mailto:scv@farrer.co.uk)

28 October 2009

By Email:  
[enquiries@charitycommission.gsi.gov.uk](mailto:enquiries@charitycommission.gsi.gov.uk)

Dear Sirs

**The Global Warming Policy Foundation ("the Foundation")**  
**Charity No: 1131448**

Further to our letter of 6 August 2009, we enclose a copy of the Conflicts of Interest Policy for the Foundation.

This has been approved by the Trustees and we should be grateful if you would confirm receipt of this copy.

We were recently advised that you have requested that documentation and correspondence should generally be sent to you via email in future. We do not, therefore, propose to send you a hard copy of the Conflicts of Interest Policy unless we hear otherwise from you.

If you have any questions please contact Sara van der Pas of this office.

Yours faithfully

*Farrer & Co*

## CONFLICTS OF INTEREST POLICY

### FOR

#### THE GLOBAL WARMING POLICY FOUNDATION ("the Charity")

#### **1. Background**

- 1.1 Charity trustees, in exercise of their duty to exercise proper stewardship over the Charity, are required to recognise and deal appropriately with conflicts of interests.
- 1.2 In part this obligation stems from the fact that any decision by the Charity to enter into a transaction ought to be influenced only by the consideration of the Charity's own interests. Accordingly for transparency and good governance, any interest of Members, Trustees and others of certain position within the Charity which could be seen as or which could give rise to a conflict of interest ought to be disclosed.
- 1.3 The Trustees of the Charity have resolved to meet this obligation and also to deal with the conflicts of interest of its staff by adopting as its policy the rules set out in this paper.

#### **2. Conflicts Register**

- 2.1. The Charity's Conflicts Register will be kept in the form of a loose-leaf file kept by the secretary of the Charity or other appropriate person. It will contain the original Conflicts of Interest Statements made pursuant to this policy.
- 2.2. The Conflicts Register will be available to the Trustees, the Charity's auditors and such other persons as the Trustees shall approve.

#### **3. Conflicts of Interest Statements**

- 3.1. The following persons shall be required to complete a Conflicts of Interest Statement ("CIS"):
  - 3.1.1. Trustees;
  - 3.1.2. members of committees of the Charity; and
  - 3.1.3 such other persons as the Trustees shall require to complete a CIS.
- 3.2. Members of the Charity shall not be required to complete a CIS unless they fall within one of the categories in 3.1 above.
- 3.3. A person required to complete a CIS shall do so:

- 3.3.1. within one month of his/her appointment;
- 3.3.2. at the end of each financial year of the Charity.
- 3.4. A copy of the Charity's CIS is set out in Schedule 1 below. The guidance notes set out in Schedule 2 below shall be reproduced on all CIS.
- 4. Procedure at Meetings**
- 4.1 Trustees and other individuals participating (in whatever capacity) in any other meeting:
  - 4.1.1 should declare at the beginning of the relevant item of business any matter in which s/he is interested (or which a member of his/her family is interested)
  - 4.1.2 must withdraw from the meeting whilst that matter is discussed unless expressly invited to remain solely in order to provide information
  - 4.1.3 may not vote on or be present during any vote on that matter
- 4.3 All decisions under a conflict of interest will be recorded by the relevant secretary of the meeting and reported in the minutes.
- 4.4 Independent external moderation may be used where conflicts cannot be resolved through the usual procedures. In the case of grave or repeated conflicts of interest between the Charity and a Trustee or other relevant individual, it may be that, in the best interests of the Charity, the individual has no option but to resign from his or her position.

**SCHEDULE 1**

**Conflicts of Interest Statement**

I confirm that:

1. I have read and accept the Guidance Notes which form part of this Statement.
2. I have set out below all potential conflicts that I am aware of at the date of this Statement (please use a continuation sheet if the space below is inadequate for the declarations you need to make).
3. I understand that in the event of a further conflict of interest (potential or actual) arising prior to my being asked to update this Statement, that I should request, complete and return to the secretary of the Charity a revised Statement.

Example	<i>My partner is a non-executive director of XWZ plc, a company involved in supplying consultancy services to the Charity</i>
1.	
2.	
3.	
4.	
5.	

NAME (please print).....DATE.....

POSITION/TITLE.....

SIGNATURE.....

Please return this form to the Chairman of the Charity.

## SCHEDULE 2

### **Guidance Notes on Conflicts of Interests**

#### **Background**

Any interest of certain individuals involved in the Charity that could be seen as or which could give rise to a conflict of interest is required to be disclosed. This Conflict of Interest Statement ("CIS") is provided for that purpose.

#### **Completion of the Conflicts of Interest Statements**

*Who must complete a Conflicts of Interest Statement?*

CIS's should be completed by members of the Board of Trustees; members of committees of the Charity; members of the board of directors of all companies in which the Charity hold a majority of the shares; and such other persons as the Trustees shall require to complete a CIS.

*What conflicts should be declared?*

As a general rule you should include in your CIS details of any interest of yours (or of a member of your family) which could be seen as or which could give rise to a conflict with your position within the Charity.

By way of example, and without limitation, such matters will include:

- \* paid or unpaid employment or self employment (including partnerships)
- \* company directorships, consultancies, advisory posts, other positions of responsibility etc (whether remunerated or not)
- \* public or voluntary sector appointments
- \* substantial shareholding/s and beneficial interests (whether in terms of value or % of issued capital) held by you and/or members of your family in a company (a) in which the Charity has funds invested or (b) which may have dealings with the Charity. 'Substantial' would include a controlling interest.
- \* membership of any special interest group

*"Family members"*

For the purpose of the CIS a person is treated as a member of your family if he or she lives within your household or is a close relative (i.e. spouse, parents, siblings, child and grandchild).

*What should I do if I am unsure whether to declare a matter on the CIS?*

If you are unclear whether something may give rise to a potential conflict of interest, discuss this with the other Trustees for guidance, and always err on the side of caution. As a general guide, ask yourself "Are there any circumstances in which this interest could embarrass or damage the reputation of the Charity?" If the answer is in the affirmative you should declare the matter.

### **Declaration of conflicts at meetings**

Individuals participating (in whatever capacity) in any other meeting (including Trustees attending Trustees' meetings):

- should declare at the beginning of the relevant item of business any matter in which s/he is interested (or which a member of his/her family is interested)
- must withdraw from the meeting whilst that matter is discussed unless expressly invited to remain solely in order to provide information
- may not vote on or be present during any vote on that matter