

# HCC Conflicts of Interest Policy



## Policy Statement

1. Although the requirements regarding managing conflicts of interest primarily apply to trustees, all leaders, staff, volunteers, and members will strive to avoid any conflict of interest between the interests of the church on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.
2. The purposes of this policy are to protect the integrity of the church decision-making process, to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of all of us.
3. **Examples of Conflicts of Interest**
  - a. A trustee who is related to a member of staff and there is decision to be taken in respect of that staff member.
  - b. A trustee or leader who has a relative or connected person in a business that may be awarded a contract to do work or provide services for the church. A situation where there is a loyalty or other bond to another charity or organisation or individual. A close family member or a business colleague who stands to benefit from a situation means that there is a conflict of interest to be declared and managed.
  - c. A trustee might be selling an asset to the charity or provide services or even join the staff.
  - d. Gifts or hospitality or other favours given to a trustee

These are examples and not intended to be a definitive list. Each trustee is responsible for declaring actual or potential conflicts. If in any doubt the chair should be consulted.

4. Upon appointment each trustee will make a full, written disclosure of interests, such as relationships, and posts held, that could potentially result in a conflict of interest. This written disclosure will be kept on file with the register of interests, and will be updated as appropriate, ideally every January 1st.
5. In the course of meetings or activities, trustees will disclose any interests in a transaction or decision where there may be a conflict between the church's best interests and the trustee's (or other connected person's) best interests or a conflict between the best interests of two organisations that the trustee is involved with.
6. After disclosure the trustee should leave the room to enable the other trustees to decide how the conflict should be managed. It may be appropriate for the trustee to be absent during the part of the meeting where the matter is discussed or the conflicted trustee may be allowed to take part in the discussion but not to vote.
7. Any such disclosure and the subsequent actions taken will be noted in the minutes.

8. This policy is meant to supplement good judgment, and staff, volunteers and trustees should respect its spirit as well as its wording.

9. **Gifts and Hospitality.** All gifts and hospitality should be declared and entered in the register of interests, loyalties and gifts. Full details should be shown including the estimated value. Gifts and hospitality with a value of under £60 can be accepted provided everyone understands there is no obligation or expectation placed on the charity thereby. A gift above this figure should be declined, or the gift could be given to the charity as a donation or another charity as appropriate. A trustee being wined and dined when there are contracts up for discussion must be avoided like the plague.

10. **Summary** Trustees have a legal duty to act in the best interests of the charity and in accordance with the governing document. A badly managed conflict of interest may prevent open discussion, result in poor decisions not in the best interests of the charity and bring discredit on the reputation of the trustees and the charity as a whole.