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| *Chandos & Dent’s Almshouses* | *Conflicts of Interest Policy* |
| *Owner* | *Finance & Admin* |
| *Author* |  |
| *Created or last revision* | *02/06/22* |
| *Review Date* | *02/06/24* |

It is the policy of Chandos & Dent’s Almshouses(the “**Charity**”) that all Trustees and those working for the Charity must at all times keep to the absolute minimum all conflicts of interest between the interests of the Charity on the one hand, and the personal, professional and business interests of the individual concerned on the other. This includes avoiding as far as possible perceptions of conflicts of interest, as well as potential and actual conflicts of interest.

The purposes of this policy are:

* to protect the integrity of the Charity’s decision-making process;
* to enable all outside parties dealing with the Charity to have confidence in the Charity’s integrity; and
* to protect the integrity and reputations of the Charity’s Trustees and all those working for the Charity.

Declaration of interests

All Trustees (and any members of staff of the Charity who may be appointed in the future) will be required to make a full written disclosure of their interests, gifts or hospitality received, relationships and holdings that could potentially result in a conflict of interests.

A declaration of interests form is provided for this purpose (and a copy is annexed at the end of this document).

These written disclosures will be kept on file by the Charity and all Trustees and staff will be required to update their disclosure as and when their circumstances change. All disclosures will be reviewed on an annual basis at the beginning of each fiscal year.

 The written disclosures will be accessible to Trustees, staff, the Treasurer and the Charity’s accountants at reasonable notice, and will be available at every meeting of the Trustees. The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2018. Data will be processed only to ensure that Trustees and all staff act in the best interests of the charity. The information provided will not be used for any other purpose.

Transactions/arrangements with the Charity

Any Trustee who has an interest in a Transaction or Arrangement with the Charity must declare it at the start of a meeting of the Trustees (or in writing to all the Trustees, to be noted at the next Trustee meeting) or as soon as it becomes evident during a meeting that such a transaction or arrangement will be discussed. Before such a transaction or arrangement can be entered into it must also either be permitted by the Constitution of the Charity or by Charity Commission consent.

Authorisation of Conflicts of Interest

All ongoing conflicts of interest (whether linked to a Transaction or Arrangement or otherwise) must be authorised either directly under the Constitution of the Charity, or by power delegated to the non-conflicted Trustees under the Constitution or by Charity Commission consent.

Declarations of Interest at Trustee Meetings etc.

In the course of meetings and all other activities where conflicts may arise, all Trustees and staff must disclose any interests they have in a transaction or decision where they, their family, their employer or their close associates will or may (or may be perceived to) receive a benefit or gain.

Any such interests will be minuted. The Chairperson or Acting Chairperson of the Trust might, at his or her discretion, then require any Trustees who have notified of any such interest to either abstain or absent themselves from the discussion of any issues where the conflict arises.

If the Chairperson declares an interest, then an Acting Chairperson should be appointed by the remaining Trustees who have not declared an interest and the Chairperson should then abide by the Acting Chairperson’s ruling on whether to abstain or absent himself or herself. If any Trustee is asked to abstain or absent himself or herself then it should be minuted.

If there is a failure to declare an interest that is known to the Chairperson of the Charity and/or the Chairperson of any such meeting/person responsible for organising such activities, the Chairperson of the Charity or other such person will declare that interest.

Other situations

There may be other situations where a potential conflict of interest could arise, e.g. personal knowledge of a potential beneficiary applicant, a decision to procure a service that does not require full Trustee approval etc. In such instances, any Trustees affected should advise the other Trustees that they should not be involved in the decision-making and the action should be recorded in the minutes of the next full Trustee meeting. This policy is meant to supplement good judgment, and staff, volunteers and trustees should respect its spirit as well as its wording.

Examples of Conflicts of Interest

This list is not exhaustive.

* Any financial decision which could result in the Trustee or a close relative of the Trustee benefiting from the outcome either directly or indirectly (e.g. having a major shareholding in a company being awarded a contract);
* Any decision regarding the occupancy of a property where the Trustee has a personal relationship with one of the people concerned;
* Any decision relating to the use of or development of the properties owned by the Trust which could have an impact on a property owned by the Trustee.

Declaration of interests form

[ ] of [ ] as [*insert position*] of Chandos & Dent’s Almshouses have set out below my interests in accordance with the Charity’s conflicts of interest policy.

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| **Category** | **Please give details of the interest and whether it applies to you or, where appropriate, a member of your immediate family, connected persons or some other close personal connection** |
| Current employment and any previous employment in which you continue to have a financial interest. |  |
| Appointments (voluntary or otherwise) e.g. trusteeships, directorships, local authority membership, tribunals etc. |  |
| Membership of any professional bodies, special interest groups or mutual support organisations |  |
| Gifts or hospitality offered to you in excess of £20 (which could be perceived to have relevance to the work of the Charity) by external individuals/bodies in the last 12 months |  |
| Any contractual relationship with the charity or any subsidiary of the Charity. |  |
| Any conflicts not covered by above |  |

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

**Signature**:

**Name**: **Date**: