

Washington Village Memorial Hall Charity

Conflicts Of Interest Policy

Authorised By The Management Committee

At The Committee Meeting Held On 13 August 2014

Introduction

This policy is based on the Charity Commission's document "Conflicts of interest: a guide for charity trustees (CC29) Annex D: Drawing up a conflicts of interest policy".

Good Practice

It is good practice for a charity's governing document to include provisions to deal with conflict of interest situations and if a governing document does not include such provisions, trustees should consider amending it. See Governing Document below.

It is also good practice to have a written conflicts of interest policy and a register of interests as these can help individual trustees and the trustee body to identify conflicts of interest promptly.

The Charity Commission encourages trustees to make the operation of the charity as transparent as possible. With this in mind the trustees may decide to make their policy on conflicts of interest available to the public and to make some or all of their register of interests publicly available. See Transparency below.

Purpose Of This Policy

The purpose of this policy is to define a framework for the handling of conflicts of interest which is in accord with the guide documented by the Charity Commission. All the Charity's conflict of interest procedures shall comply with this policy.

Governing Document

The Committee recognises that the Charity's governing document does not comply with the Charity Commission's guidance because it does not give any guidance about conflicts of interest or the procedures for dealing with conflicts of interest. The Committee intends to update the governing document and will include statements on conflict of interest that comply with the Charity Commission's guidance.

Trustee's Responsibilities

All trustees have a legal duty to act only in the best interests of their charity. The Charity Commission expects trustees to take appropriate steps in line with its guidance to ensure that they can do this.

To fulfil their legal duty to act only in the best interests of the charity, trustees have a personal responsibility to declare conflicts of interest. They also have a duty to be vigilant and point out any potential or actual conflicts of interest.

Trustees have a responsibility to ensure that relevant and sufficient policies and procedures are in place to identify potential conflicts of interest and to deal with any actual conflict of interest quickly and effectively.

Other Volunteer's & Staff's Responsibilities

All volunteers and staff have a responsibility to declare, as soon as practicable, any conflicts of interest which affect them both generally and prior to participating in any discussion or decision.

Trustee, Volunteer's & Staff's Benefits

In accordance with paragraph 15 of the Charity's Scheme document, no trustee shall take or hold any interest in any property belonging to the Charity, other than for the purpose of being a trustee, or receive any remuneration, or be interested in the supply of work or goods at the cost of the Charity.

Pre-Appointment

Trustees

Prior to appointment all trustees shall register their interests and declare any conflicts of interest.

If any trustee is likely to be subject to serious or frequent conflicts of interest, the existing trustees shall formally consider whether that trustee should be appointed, or if the trustee is elected or nominated whether the trustee should resign.

If an elected or nominated trustee declines to resign when asked to do so, the matter shall be referred to the Charity Commission.

Volunteers, Staff & Contractors

Prior to a volunteer working for the Charity or a member of Staff being employed by the Charity, they shall register their interests and declare any conflicts of interest.

Prior to a contractor being contracted by the Charity the trustees shall determine whether the services being contracted could give rise to conflicts of interest and, if so, shall require the contractor to register his interests and declare any conflicts of interest.

If a serious or frequent conflicts of interest are likely to arise, the trustees shall formally consider whether that person should be appointed.

Committee Meetings

The Committee shall ensure that there is a standard agenda item at the beginning of each Committee meeting for trustees to declare any actual or potential conflicts of interest with any agenda item.

The Committee shall formally record how such conflicts of interest are handled.

Handling Conflicts Of Interest

It is essential to the reputation of the Charity that the handling of all conflicts of interest is documented and done as transparently as possible.

The Committee shall ensure that the record of all conflicts of interest is reviewed regularly by the Committee.

Transparency & Communication

Transparency

The Committee shall make this policy document available publicly by making it available on the Charity's website or some other means.

The handling of conflicts of interest shall be as transparent as possible, without compromising personal and private information.

Communication

The Committee shall ensure that this policy document is widely communicated within the Charity and is available and understood by all trustees, volunteers and Staff.

Accounts

If the Charity prepares accruals accounts, the Committee shall ensure that any trustee benefits are

disclosed in the Charity's accounts.

Policy Review & Enforcement

The Committee shall review this policy regularly and update it as necessary.

The Committee shall nominate one of the trustees to take responsibility for the communication, review and enforcement of this policy.

Annex A

Definitions

Definitions

Conflict Of Interest

A conflict of interest is any situation in which a trustee's personal interests or loyalties could, or could be seen to, prevent the trustee from making a decision only in the best interests of the charity.

Conflict Of Loyalty

This means a particular type of conflict of interest, in which a trustee's loyalty or duty to another person or organisation could prevent the trustee from making a decision only in the best interests of the charity.

Contractor

A contractor is anyone, not employed by the Charity, who is formally contracted to deliver a service to the Charity.

Shall

The use of the verb "shall" means that the statement is mandatory and may be based on a legal obligation.

The Charity

The Charity means The Washington Village Memorial Hall Charity.

The Committee

The Committee means the Management Committee of the Washington Village Memorial Hall Charity.

Trustee

A trustee is a member of the Committee and all Members of the Committee are trustees.

Volunteer

A volunteer is anyone, other than a trustee or employed staff, that contributes personal time and effort in support of the activities of the Charity.

Staff

A Staff member is anyone employed by the Charity to provide a service to the Charity.