

Conflict of Interest policy

Overview and Objectives

This policy covers how the PCC, and all its sub-committees, will manage the interests of its Members and Officers and any conflict between them and the objects of the PCC.

All Members and Officers (“Trustees”) of the PCC they have a duty to the PCC to act in the best interests of the PCC and this must take precedence. Conflicts of interest may arise where the interests of Trustees or “connected persons” (e.g. their family or close colleagues) are incompatible or in competition with the interests of the charity.

A conflict of interest is any situation in which a Trustee’s personal interests, or interests which they owe to another body, and those of the Charity arise simultaneously or appear to clash and may create problems, such as:

- inhibit free discussion
- result in decisions and/or actions that that are not in the best interests of the charity
- risk the impression that the charity has acted improperly.
-

The purpose of this policy is to protect both the PCC and its Trustees from these things by requiring trustees to take the following actions:

1. Declare Interests & gifts that may cause conflict;
2. Recognise when to declare an interest to update the register of interests, and
3. Dealing with conflicts of interest

The appendices set out suggested procedures for each of the actions set out above

Approved by the PCC on 29 January 2025

(Format updated October 2025)

Next review date January 2028

Appendix 1: Declare Interests that may cause conflict

Appendix 2: When to declare an interest

Appendix 3: Dealing with conflicts of interest

Exhibit 1: Declaration of interest form

Conflict of Interest policy

Appendix 1

Declare Interests that may cause conflict.

1. **Direct Financial Benefits or Interest** –where a Trustee is employed by the charity, or acting as a consultant or paid adviser. Or where the charity engages the services of a company where a Trustee is employed, is a director or shareholder. Or where land is sold to or used by a Trustee. Or where a trustee grants loans to a charity.
2. **Indirect Financial Interest**– where financial benefits accrue to a close member of the Trustee’s family, a friend, business partner, employer or colleague of a Trustee.
3. **Non-Financial - Conflicts of Loyalties**– where there may be a conflict of interest, duty or loyalty) should a Trustee have another appointment or be associated in some way with another agency or organization operating in the same area of work as the Charity or providing the Charity with services or grant funding.

In all the above situations it is up to the Trustee to determine whether his/her involvement in a matter relating to a third party represents a potential conflict of interest and should therefore be declared. If the Trustee is not sure, then the Trustee should err on the side of caution and make a declaration

Gifts and Hospitality

In the normal course of events, trustees would not be expected to receive gifts. This policy is also designed to address the rare circumstances in which they may be offered.

Trustees are asked to declare their interests in addition to any gifts or hospitality received in connection with their role as Trustee in the Charity. Any gifts or hospitality offered over £10 should be refused.

Conflict of Interest policy

Appendix 2

When to Declare an Interest

All interests should be declared using the attached form (Exhibit 1) at the beginning of a meeting when a relevant matter is on the agenda or as soon as the interest becomes apparent. There are four occasions when a Trustee’s personal interests are likely to come into conflict with those of the charity and should be immediately declared.

1. At Their Appointment: Every new Trustee will be asked to complete a Declaration of Interests Form.
2. Annually: after each APCM and prior to the first subsequent PCC meeting, Trustees will be asked to review their Declaration of Interests Form and either update it or confirm that it is still correct.
3. When any significant changes take place: New matters should not wait until an annual declaration is made before being notified. Trustees should notify the PCC Secretary of all changes or additions as soon as they are known to the Trustee.
4. Verbally at any PCC meeting: where specific relevant conflicts or potential conflicts may arise. At the start of each PCC meeting the Chair will ask for any declarations relevant to the agenda to be made known. Trustees should also raise the matter during the course of the meeting as soon as a potential conflict arises or may be seen to arise. These will be minuted.

If a Trustee fails to declare an interest that is known to the PCC Secretary and/or the Chair of the PCC meeting, the PCC Secretary or Chair will declare that interest.

Register of Interests

The Declaration of Interests form will be used as the basis for recording a Trustee’s interests and gifts or hospitality received on the Charity’s Register of Interests which is maintained by the PCC Secretary in accordance with the Data Protection Policy.

Trustees naming a third party as a Connected Person on their declarations shall ensure that they have permission from that individual to pass personal data about that individual to the Charity. If there is a problem with obtaining such consent, please contact the PCC Secretary.

Conflict of Interest policy

Appendix 3

Dealing with conflicts of interest

As set out above, Trustees should declare their interest at the earliest opportunity.

Where conflicts of interest arise and the interest relates to a matter under discussion, the Trustee or the PCC itself must decide whether the interest falls within the following categories:

Level of conflict	Consequence and handling
<p>Category A</p> <p>Creates a real danger of conflict of interest or bias (that is, the interest affects him/her, or a person or business connected to him/her, more than the generality affected by the decision).</p>	<p>The Trustee must leave the meeting, not participate in the discussion, or vote, on the matter.</p>
<p>Category B</p> <p>Does not create a real danger of conflict of interest or bias, BUT might reasonably cause others to think it could influence a decision;</p>	<p>The Trustee must not participate in the discussion, or vote, on the matter.</p> <p>It shall be at the discretion of the non-conflicted Trustees whether the Trustee may remain in the meeting.</p>
<p>Category C</p> <p>is trivial and does not create a real danger of conflict of interest or bias or the appearance of bias;</p>	<p>If the declared conflict is judged to be trivial by the non-conflicted Trustees, the Trustee may participate in the discussion, and vote.</p>

The decision as to how the conflict of interest is to be dealt with must be set out in a resolution of the PCC. The resolution may require other steps to be taken, for example, requiring information to be kept confidential or other undertakings to be given by the conflicted Trustee.

Trustees and the PCC should endeavour to ensure that a Trustee with a conflict of interest under Category A is not provided with information in that capacity which enables him or her to obtain any advantage. In particular, the person who is responsible for sending information to the Trustees prior to a Trustee meeting should check the Register of Interests and take any other reasonable steps to ensure that no information is sent to a Trustee who may have a conflict of interest relating to that information.

Where a Trustee faces persistent or critical conflicts of interest, the PCC and the Trustee will need to consider whether the Trustee may need to resign.

Conflict of Interest policy

Exhibit 1 Harnham PCC Declaration of Interest Form (PRIVATE & CONFIDENTIAL to PCC)

I.....have set out below my interests in accordance with the PCC’s Conflict of Interest policy.

Potential source of conflict:	Please give details of the Interest and whether it applies to yourself or a person connected with you.
Current employment and any previous employment in which the Trustee continues 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	
Investments in companies, partnerships and other forms of business, major shareholdings, beneficial interests where these are felt to constitute a potential conflict of interests. (Investments where the Trustee holding constitutes not more than 1% of the capital of the company may generally be omitted)	
Any contractual relationship with the Charity	
Ownership of any property that could create a conflict of interest	
Any other conflicts that are not covered above where there could be perceived to be conflicts of interests.	
Any other people, organisations, companies or institutions with whom you are “connected” (under Charity or Company Law), whom you have not already referred to on this form.	
Gifts and Hospitality received in previous 12 months	

Signed

Date