

*St Christopher's Church Parochial Church Council
Conflict of Interest Policy*

Conflict of Interest Policy

This policy applies to all members of the PCC for St Christopher's Church Hinchley Wood, who are referred to hereinafter as 'trustees'

Why we have a policy

Trustees have a legal obligation to act in the best interests of the Parochial Church Council of St Christopher's Church ("PCC") and in accordance with charity law and the Church Representation Rules, and to avoid situations where there may be a potential conflict of interest.

Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of the PCC. Such conflicts may create problems; they can:

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

The aim of this policy is to protect both the PCC and the individuals involved from any appearance of impropriety.

The declaration of interests

Accordingly, we are asking trustees to declare their interests, and any gifts or hospitality offered and received in connection with their role in the PCC. A declaration of interests' form is provided for this purpose, listing the types of interest you should declare.

To be effective, the declaration of interests needs to be updated at least annually, and when any material changes occur.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the Churchwardens or the Vicar for confidential guidance.

This register of interests shall be used to record all gifts of a value over £100 and hospitality over £50 received by the trustees.

Interests and gifts will be recorded on the charity's register of interests, which will be maintained by the Churchwardens.

The register will be accessible by the Trustees.

Data protection

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 act in the best interests of the PCC. The information provided will not be used for any other purpose.

What to do if you face a conflict of interest

If you believe you have a perceived or real conflict of interest you should:

- declare the interest at the earliest opportunity
- withdraw from discussions and decisions relating to the conflict.

The PCC secretary should take special care to ensure that minutes or other documents relating to the item presenting a conflict are appropriately redacted for the person facing the conflict. A balance needs to be made to ensure that the person still receives sufficient information about the activities of the PCC generally without disclosing such sensitive information that could place the individual in an untenable position.

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If you fail to declare an interest that is known to the PCC secretary and/or the Churchwardens, they will declare that interest.

Decisions taken where a trustee or member of staff has an interest

In the event of the PCC having to decide upon a question in which a trustee or member of staff has an interest, all decisions will be made by vote at a full PCC meeting, with a simple majority required.

A quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate.

Interested board members may not vote on matters affecting their own interests

All decisions under a conflict of interest will be recorded by the PCC secretary and reported in the minutes of the meeting. The report will record:

- the nature and extent of the conflict
- an outline of the discussion
- the actions taken to manage the conflict.

Where a trustee benefits from the decision, this will be reported in the annual report and accounts in accordance with the current Charities SORP.

All payments or benefits in kind to trustees will be reported in the charity's accounts and annual report, with amounts for each trustee listed for the year in question.

Where a member of the PCC's staff are connected to a party involved in the supply of a service or product to the charity, this information will be fully disclosed in the annual report and accounts.

Managing contracts

If you have a conflict of interest, you must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.