

# Conflicts of Interest Policy

Date policy adopted by the trustees:	December 2024	Latest date for renewal of the policy:	December 2025
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## Introduction

This policy is primarily concerned with conflicts of interests in relation to Trustees and their decision making, but it is recognised that the guidance may also be applicable to Church Leaders and to employees.

Within Gillingham Community Church (GCC), all Church Leaders, Trustees, employees and volunteers will seek to avoid any conflict of interest between the interests of the Church and any personal, financial, professional, business or family interests. This includes avoiding the perception of a conflict of interest as well as an actual conflict of interest. Family members for whom possible conflicts of interest should be considered include a spouse, child, parent, grandchild, grandparent, brother, sister, brother-in-law or sister-in-law.

The purpose of this policy is to protect the Church's decision-making processes and the integrity of all involved. Trustees have a legal duty to make decisions that are only in the best interest of GCC.

## Identifying conflicts of interest

Conflicts of interests may arise where an individual's personal, family, organisation or business interests and/or loyalties conflict with those of the GCC.

Such conflicts may create problems as they can:

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

Trustees also have a legal duty to avoid conflicts of interest.

## Managing conflicts of interest

Conflicts of interest may be inevitable. Therefore, it is necessary to act to prevent them from interfering with the ability to make a decision in the best interests of GCC.

The Charities Commission recommends following a three-step approach (identify, prevent, record) so that Trustees (and others) are able to comply with their duty.

### 1. Identify and declare conflicts of interest

All GCC Trustees are required to declare any potential conflicts of interest before discussions or decisions are made. To this effect the following needs to be implemented:

- Any newly-appointed Trustee should complete and sign a Declaration of Interests form within one calendar month of being appointed and thereafter when any changes occur. Declaration forms are available from the church office.
- In addition, Declaration forms should be reviewed at least annually and updated with a new Declaration of Interests form whenever changes occur.

- GCC should maintain an updated document containing a registry of conflicts of interest. Any such conflicts of interest should be noted at the earliest opportunity in the minutes of a Trustees Meeting.
- At the beginning of each meeting of the Trustees, a standing agenda item will provide an opportunity for Trustees to declare their interests

In the course of meetings or activities, Trustees will disclose any interests in a discussion, transaction or decision where there may be a conflict between GCC's best interests and the individual's best interests, or a conflict between two organisations that the individual is involved with. If in doubt, the conflict must be declared anyway and clarification sought.

## **2. Prevent the conflict of interest**

Once a conflict of interest has been identified, it will be prevented from affecting the decision-making by:

- Working within the governing document(s) of GCC
- Taking appropriate steps to manage the conflict, which will usually mean that the person affected does not take part in discussions about the issue (eg, is asked to leave the room or is absented from the meeting during that time) and does not participate in the decision-making process or any vote on the matter.
- Where an individual may benefit indirectly, they may (at the discretion of others present without a conflict of interest) be permitted to take part in the discussions and/or any final decision made.

In the event of a conflict of interest which could affect the aims and objectives of GCC, the person(s) involved may not participate in any decision on matters affecting that interest.

## **3. Record a conflict of interest**

GCC will keep a written record of the conflict of interest and how it is dealt with in the minutes of the meetings, explaining:

- What sort of conflict of interest it was
- Which Trustee(s) was/were affected
- When it was declared
- How it was managed

All decisions under a conflict of interest will be recorded in the minutes of the meeting. The minute will record the nature and extent of the conflict and the actions taken to manage the conflict.

# Gillingham Community Church

## Trustee declaration of interests form

Name of trustee: .....

As a trustee of Gillingham Community Church have set out below my interests in accordance with the organisation's conflicts of interest policy.

I have actual or potential conflicts of interest to declare in relation to: (i) my employment; (ii) other appointments (voluntary or otherwise); (iii) memberships of organisations; (iv) investments or shareholdings; (v) gifts or hospitality received; (vi) benefits received from GCC (above those available to all); (vii) contractual relationships or other conflicts. These are listed below:

I have no actual or potential conflicts of interest to declare

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 on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy.

Signed: .....

Date: .....