

Faith Movement CIO

Conflict of Interest Policy

1. Introduction

The Faith Movement Charitable Incorporated Organisation (hereinafter referred to as “the Faith Movement”) is a charity registered in England, number 1188137.

2. The Declaration of Interests

All Trustees, members and volunteers of the Faith Movement are required to declare their interests, and any payments (including, but not limited to, benefits in kind such as gifts, hospitality, shopping, travel concessions, preferential treatment, etc.) received in connection with their roles in the Faith Movement where such interests would, or might, conflict with or otherwise influence their decision-making in respect of the Faith Movement's activities.

As the nature and issues involved in “Conflicts of Interest” can vary considerably, there is no prescribed form for declaring a Conflict of Interest.

3. Conflict of Interest Procedure

If an individual has, or believes to have, a Conflict of Interest, as described in the section above, the individual **must** write to the Board of Trustees and declare a Conflict of Interest at the earliest opportunity.

If the individual is not sure what to declare, or whether/when an earlier declaration needs to be updated, the individual must err on the side of caution. If the individual would like to discuss this issue, the individual may contact the Secretary of the Trustees of the Faith Movement for confidential guidance.

Remember: declaring a Conflict of Interest is **not**, *per se*, a declaration any impropriety on the individual’s part or on anyone else’s part; it is only **failing to declare** a Conflict of Interest which carries with it a significant risk of impropriety,

particularly if the Conflict of Interest were to result in a failure to comply with Charity Law.

If a Trustee or member of the Faith Movement becomes aware that an individual has, or might have, a Conflict of Interest, they are obliged to report it to the Board of Trustees even if the individual does not.

4. When a Conflict of Interest is declared

All declarations of Conflicts of Interest will be treated with appropriate confidentiality. All declarations of Conflicts of Interest will be considered by the Trustees to assess the level of risk to the Faith Movement and what actions need to be put in place to eliminate or, at least, mitigate the risk. In more complex cases, the Trustees may appoint one (or more) of their number to assess the matter in more detail. If it is felt that more information is required to assess the Conflict of Interest more fully, the Trustee leading the assessment will contact the individuals involved.

All declarations of Conflicts of Interest will be recorded in the Faith Movement's Register of Conflicts of Interest, even if, having considered the declaration, the Trustees conclude that the declared Conflict of Interest presents no significant risk to the Faith Movement. For further details of the Register, see the section "Register of Conflicts of Interest" below.

Any Trustee who is implicated in a Conflict of Interest, whether directly or as a connected person, may not participate in the assessment of the risk but may be called by the Trustee(s) undertaking the assessment to provide further details or answer specific questions.

Trustees may, however, participate in general discussions from which they may indirectly benefit, for example where the benefits are universal to all users, or where the benefit is minimal to individual Trustees.

5. Data Protection

The information provided will be processed in accordance with data protection principles as set out in the current Data Protection legislation. Data will be processed only to ensure that Trustees, members, and volunteers act in the best interests of the Faith Movement. The information provided will not be used for any other purpose.

6. Decisions taken where a Trustee has a Conflict of Interest

In the event of the Board of Trustees having to decide upon a question in which a Trustee has an interest, all decisions will be made by vote, with a simple majority required. A quorum must be present for the discussion and decision. Any person declaring a Conflict of Interest will not be counted when deciding whether the meeting is quorate and may not vote on matters affecting their own interests. All decisions where there is a Conflict of Interest will be recorded in the minutes of the meeting. The report will record:

1. the persons involved;
2. the nature and extent of the Conflict(s) of Interest;
3. an outline of the discussion;
4. the actions taken to manage the Conflict(s) of Interest.

Where it is determined that a Trustee with a Conflict of Interest may nevertheless legitimately benefit from the decision, this will be reported in the annual report and accounts (in accordance with the current Charities Statement of Recommended Practice (SORP) when applicable).

All payments or benefits in kind to Trustees will be reported in the Faith Movement's Trustees' Annual Report and Statement of Financial Activity, with amounts for each Trustee listed for the year in question.

Where a Trustee is connected to a party involved in the supply of a service or product to the Faith Movement, this information will also be fully disclosed in the Trustees' Annual Report and Statement of Financial Activity.

Independent external moderation will be used where conflicts cannot be resolved through the usual procedures.

7. Managing Contracts

Where a Trustee, member or volunteer has a Conflict of Interest, they must not be involved in managing or monitoring a contract in which they 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.

8. Register of Conflicts of Interest

The Faith Movement will maintain a Register of Interests of all reported Conflicts of Interest which will contain, as a minimum, the following information.

- a) The date on which the Conflict of Interest was first reported, supplemented where appropriate by the dates on which any changes to the Conflict of Interest were reported, including the date on which the Conflict of Interest ceased to be an issue.
- b) **Note:** once reported, a Conflict of Interest will remain “on the record” for a minimum of 3 complete reporting years after the Conflict of Interest ceases to exist (e.g. if the individual concerned, or any connected persons, ceases to be involved with the Faith Movement);
- c) The name of the individual involved and, in the case of a Conflict of Interest involving one or more connected persons, the names of those connected persons and their relationships;
- d) The position/role/responsibilities within the Faith Movement of the individual involved;
- e) The type of Conflict of Interest (e.g. personal benefits, family involvement, business involvement, other);
- f) Details of the Conflict of Interest, including its potential impact on the Faith Movement;

- g) Mitigation of the Conflict of Interest, i.e., the steps taken by the Trustees to ensure that the Conflict of Interest does not adversely influence the charitable activities of the Faith Movement.

This Register of Interests shall also be used to record all gifts of a value over £20 received by the Trustees, members, and volunteers.

The Register of Interests will be accessible to all the Trustees and members of the Faith Movement.

Although the Faith Movement is not governed by the Freedom of Information Act, the Register of Interests will also be accessible to the members of the Faith Movement under the same principles as apply to requests under the Freedom of Information Act, namely:

1. the Trustees reserve the right not to disclose details of declared Conflicts of Interest where such disclosure would compromise the right to privacy of the individual(s) concerned;
2. the Trustees reserve the right not to disclose details of declared Conflicts of Interest which involve commercially sensitive information;
3. requests from members must be for specific information in pursuit of a legitimate concern and not casual enquiries to see what the Register of Interests contains.

Adopted 19th May, 2021.....

Review May 2023.....

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