



# CONFLICTS OF INTEREST POLICY

Last Update: March 2019

Agreed by Trustees at meeting held on 28.3.19

All trustees and Managers of Hollow Lane Club and staff attending the Trustee and Management Committee meetings of The Hollow Lane Club will strive to avoid any conflict of interest between the interests of the charity on the one hand, and personal, professional and business interests on the other. This includes avoiding actual conflicts of interest as well as perception of conflicts of interest.

The purpose of this policy is to protect the integrity of the charity's decision making process, to enable our stakeholders to have confidence in our integrity, and to protect the integrity and reputation of trustees and staff.

1. In this policy statement the expression "the charity" means The Hollow Lane Club, "trustees" or "trustee" means the members of the Executive Management Committee of the charity or any one of them, "Managers" refers to anyone in a managerial position at The Hollow Lane Club and "staff" refers to regular staff attendees of the Trustee and Management Committee meetings.

2. A conflict of interest is any situation in which a manager, staff member or trustee's personal interests, or interests which they owe to another body, and those of the charity arise simultaneously or appear to clash. Conflicts of interest include:

2.1. direct financial gain or benefit to a manager, staff member or trustee or another body where they owe interests

2.2. indirect financial gain or benefit to a manager, staff member or trustee via a third party (e.g. a family member or another business or body in which the manager, staff member or trustee has an interest)

2.3. non-financial gain or advantage to a manager, staff member or trustee or another body where they owe interests

2.4. conflict of loyalties, e.g. where a manager, staff member or trustee is a member of another body which provides services to or funding for the charity; a relative of the staff member or trustee is employed by the charity; a manager, staff member or trustee is also a user of services who

must decide whether fees from users should be increased.

3. Managers, staff members and trustees are reminded that in the conduct of the affairs of the charity their duty is to act with the managers, staff members and the other trustees in the best interests of the charity, and that this duty takes precedence over their responsibility to any other business or body in which the manager, staff member or trustee has an interest.
4. Each manager, staff member and trustee must complete a declaration of interest form when they are appointed, and will be requested to either update or sign off that there are no changes to the form on an annual basis. Such declarations will be recorded and maintained on a central Register of Interests for the HLC.
5. Each manager, staff member and trustee shall keep under review their personal position in relation to the affairs of the charity so that any potential conflict of interest may be identified at an early stage.
6. Whenever a manager, staff member or trustee is aware of an actual or potential conflict of interest on their part in relation to a matter to be discussed at a Trustee and Management committee meeting, they shall declare the interest at the beginning of the meeting or, if later, as soon as they first become aware of it.
7. Any disagreement as to whether an interest should be declared at a meeting shall be determined by the Chairman of the meeting or, if the Chairman is the trustee concerned, by a vice-chairman appointed ad hoc by a majority decision of the trustees present other than the Chairman.
8. When an interest is declared under paragraph 6, the manager, staff member or trustee concerned may be asked to withdraw from the meeting for any discussion or decision on the matter in which the interest arises, after providing any relevant information which the Chairman of the meeting may request. Withdrawal will depend on the majority judgement of the other trustees present at the time.
9. The minutes of the meeting shall include details of any declarations of interest, and discussions and decisions resulting therefrom.
10. No transaction between the charity and a manager, staff member or trustee, or which provides any direct or indirect benefit to a manager, staff member or trustee or another business or body in which they have an interest, shall be entered into unless authorised in accordance with the sign off authority levels specified in the Finance Policy.
11. Use of the charity's services by a manager, staff member or a trustee does not require any special authority, provided that such use is on the same terms as would apply at arms-length to a similar person who was not a manager, staff member or trustee.

This policy is meant to supplement good judgment, and managers, trustees and staff attending the Trustee and Management Committee meetings should respect its spirit as well as its wording.