

Conflict of Interest Policy 2016

Renewable every year

All staff, educators, volunteers and trustees of the Spiritual Companions Trust will strive to avoid any conflict of interest between the interests of the Trust on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

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

Examples of conflicts of interest include:

- 1 A trustee, educator or staff member who is also a user may be faced with a decision in a committee meeting regarding whether fees for users should be increased.
- 2 A trustee who is related**ⁱ to a member of staff and there is decision to be taken on staff pay and/or conditions at a committee meeting.
- 3 A trustee, educator or staff member who is also on the committee of another organisation that is competing for the same funding.
- 4 A trustee, educator or staff member who has shares in a business that may be awarded a contract to do work or provide services for the organisation or is a director, partner or employee or related to someone who is**ⁱⁱ.

Upon appointment each trustee will make a full, written disclosure of interests, such as relationships, and posts held, that could potentially result in a conflict of interest. This written disclosure will be kept on file and will be updated annually or as appropriate.

In the course of meetings or activities, staff, educators and trustees will disclose any interests in a transaction or decision where there may be a conflict between the Trust's best interests and the staff's, educators' or trustees' best interests or a conflict between the best interests of two organisations in which staff and trustees may be involved. If in doubt the potential conflict must be declared and clarification sought.

In the case of a conflict of interests arising for staff, educators or trustees because of a duty of loyalty owed to another organisation or person and the conflict is not authorised by virtue of any other provision in the memorandum or the articles, the unconflicted trustees may authorise such a conflict of interests where the following conditions apply:

1. The Charity Commission's permission is sought before a benefit for a trustee may be authorised that isn't otherwise authorised in the Memorandum of Articles or already authorised in writing from the Commission.
2. The trustee, educator or staff member who has declared the conflict of interest withdraws

from the part of the meeting at which there is discussion of any arrangement or transaction affecting that other organisation or person.

3. The trustee, educator or staff member who has the conflict of interest does not vote on any such matter.
4. The other trustees who have no conflict of interest in this matter consider it is in the interests of the charity to authorise the conflict of interest in the circumstances applying.
5. Any such disclosure and the subsequent actions taken will be noted in the minutes of the trustees' meetings or staff and educators meetings.

For conflicts of interest that may affect the educational provision of the Trust, such as enrolment and assessment, the Trust will follow the Conflict of Interests Policy of its accrediting organisation, the Crossfields Institute, and seek its advice where relevant.

For all other potential conflicts of interest the advice of the Charity Commission will be sought and the advice recorded in the minutes. All steps taken to follow the advice will be recorded.

This policy is meant to supplement good judgment, and staff, educators, volunteers and trustees should respect its spirit as well as its wording.

William Bloom, Director
October 2016

ⁱ A relative may be a child, parent, grandchild, grandparent, brother, sister, spouse or civil

ⁱⁱ Ibid