

This Policy applies to all directors / trustees of the Church Investors Group (CIG) (a charitable company limited by guarantee).

Directors / trustees have a legal obligation to act in the best interests of the CIG and in accordance with the Charity's governing documents to avoid situations where there may be a potential conflict of interest.

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

Such conflicts may create problems as they can:

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

The purpose of this Policy is to protect the directors / trustees from any appearance of impropriety.

The Declaration of Interests

Upon appointment each director / 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 added to the Conflict of Interests Register which will be reviewed at least annually at a meeting of the directors / trustees and / or when any material changes occur.

At the beginning of each meeting of the directors / trustees, a standing agenda item will provide an opportunity for directors / trustees to declare their interests.

Throughout their appointment the director / trustee should declare their interest at the earliest opportunity.

After disclosure, a director / trustee may be asked to leave the room for the discussion of items of business relating to their interests. They may not be able to participate in the decision depending on the judgement of the other directors / trustees present at that time. If the decision could result in the director / trustee receiving a benefit, then they must not participate in the decision-making process or any vote on the matter. A quorum must be present for the discussion and decision; interested parties will not be counted in the quorum for that part of the meeting and they must withdraw from the meeting during any vote on the conflicted item, if requested to do so by the Chair. Any such disclosure and the subsequent actions taken will be noted in the minutes.

There are situations where a director / trustee may participate in discussions from which they could indirectly benefit, for example where the benefits are universal to all users, or where their benefit is minimal. This action will be agreed by the Chair and minuted accordingly.

If a director / trustee fails to declare an interest that is known to the Secretary and /or the Chair, the Secretary or Chair will declare that interest.

The following should be declared:

1. Any appointment involving management or supervision of another organisation (e.g. trustee of another charity, director of a company etc.)
2. Any employment or supervisory relationships with a CIG member
3. Shareholdings above 5% in any publicly listed company
4. Shareholdings of any value in a private company
5. Family relationships with any other directors / trustees and / or members
6. Any gifts, hospitality¹ or inducements received in the course of performing CIG duties
7. Any other ties that could result, or be perceived to result, in a conflict of interest

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

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

The Secretary will ensure that minutes or other documents relating to the item presenting a conflict are appropriately redacted for the person facing the conflict. A balance is needed to ensure that the director / trustee receives enough information about the activities of the CIG without disclosing such sensitive information that could place the individual in an untenable position.

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 James Corah (Secretary of the CIG) on 0207 489 6047 james.corah@ccla.co.uk for guidance. The Conflict of Interests Register will be available for inspection by written request to the Secretary.

Data protection

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2018 and the General Data Protection Regulation. Data will only be processed to ensure that directors / trustees act in the best interests of the CIG. The information provided will not be used for any other purpose.

This Policy is meant to supplement good judgment, and directors / trustees are expected to respect its spirit as well as its wording.

¹ Gifts and hospitality should only be accepted if they are below the value of £50, have not been solicited, do not come with an obligation and are not intended to influence organisational decision making.