



# Conflicting Interests and Trustees Conflict of Interest Policy

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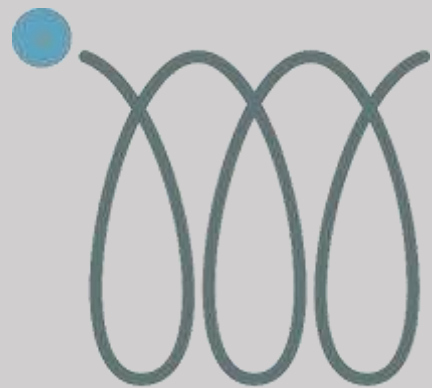
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Board of Trustees

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## 1. Introduction

The purpose of this policy is to protect the integrity of Grace Foundation's decision-making processes and ensure that trustees, staff, and volunteers act in the best interests of the organisation. This policy provides a framework for identifying, disclosing, and managing conflicts of interest.

## 2. Purpose and Scope

Grace Foundation recognises that individuals involved in the charity may have connections, personal interests, or external obligations that could conflict with their duties. This policy aims to:

- Ensure transparency and accountability.
- Prevent conflicts from undermining trust in the charity.
- Comply with legal and regulatory obligations, including the Charity Commission's guidance.

This policy applies to:

- Trustees
- Staff
- Volunteers
- Anyone acting on behalf of Grace Foundation

It covers actual, potential, or perceived conflicts of interest.

Grace Foundation receives HR, IT, and financial services from IMG (UK) Holdings Ltd and its subsidiary entities (collectively referred to as IMG). Any mention of IMG in relation to Grace Foundation pertains to these entities.

This policy is entirely non-contractual and does not form part of an employee's contract of employment.

## 3. Definitions

### 3.1 Conflict of Interest

A situation where an individual's personal, financial, or other interests could compromise their ability to act impartially and in the best interests of Grace Foundation.

Examples:

- A trustee benefiting financially from a charity contract.
- A staff member with a personal relationship influencing recruitment decisions.
- A volunteer promoting an external organisation during charity activities.

### 3.2 Related Party Transaction

Any arrangement between Grace Foundation and an individual connected to the charity (e.g., trustee, staff member, or their close family) or any entity either controlled by such individual or an entity that the individual could benefit from.

## 4. Responsibilities

**Trustees:** have a legal duty to act in the best interests of the charity and to declare conflicts of interest at the earliest opportunity.

**Staff and Volunteers:** must disclose any conflicts of interest to their line manager, the Executive Director, or a member of the Senior Leadership Team.

## 5. Policy Principles

**Transparency:** all conflicts of interest must be declared and documented.

**Impartiality:** individuals must prioritise the charity's interests over personal or external interests.

**Accountability:** compliance with charity law, regulatory guidance, and this policy is mandatory when managing conflicts.

## 6. Procedures for identifying and managing conflicts

### 6.1 Declaration of Interests:

Trustees must complete a Declaration of Interests form annually, listing financial and non-financial interests.

Staff and volunteers should notify their line manager in writing if a new conflict arises.

### 6.2 Register of Interests

The charity will maintain a Register of Interests, updated annually and whenever new interests are declared.

This will include:

- Name of the individual.
- Nature of the interest.
- Steps taken to manage the conflict.

### 6.3 Managing Conflicts in Meetings

If a conflict arises during a meeting:

1. The individual must declare the conflict.
2. Trustees or the chair will decide how to proceed, which may include:
  - Excluding the individual from related discussions.
  - Allowing participation in discussions but not voting.
3. The decision will be recorded in the meeting minutes.

## 6.4 Serious Conflicts

In cases where a serious conflict of interest cannot be managed, the individual may be required to step down from their role or abstain from involvement in specific activities.

## 7. Transparency

Related party transactions and significant conflicts will be disclosed in Grace Foundation's annual report and accounts, as required by the Charity Commission.

## 8. Managing Trustee-Specific Conflicts:

### 8.1 Identifying and Declaring Conflicts

Trustees must declare any new or emerging conflicts at the start of trustee meetings or as soon as they arise. Examples include:

- A trustee benefiting financially from a charity contract or partnership.
- A trustee's close relative being employed by the charity.
- Personal loyalty to another organisation influencing trustee decisions.

### 8.2 Recording Conflicts

All conflicts are recorded in:

- The Minutes of Trustee Meetings, including the nature of the conflict and actions taken to manage it.
- The Register of Interests, maintained by the Trustee Secretary.

### 8.3 Managing Conflicts

When a conflict is identified:

1. Discussion: The Chair of Trustees will lead a discussion to determine the best course of action.
2. Options for Managing Conflicts:
  - Exclusion from Discussions.
  - Participation with Restrictions.
  - Delegation to a non-conflicted group of trustees.
  - Resignation in severe cases.
3. Documentation: The decision and reasoning are recorded in the meeting minutes.

### 8.4 Handling Serious Conflicts

If a trustee may personally benefit, steps include verifying compliance with governing documents, seeking Charity Commission approval, and recording the arrangement.

## 9. Non- Compliance

Failure to disclose or manage conflicts of interest may result in:

- Disciplinary action for staff or volunteers.
- Trustee removal, in line with this policy.
- Reporting to the Charity Commission, if the conflict leads to significant harm.

## 10. Confidentiality

Declarations of interest and discussions about conflicts are handled confidentially, shared only on a need-to-know basis.

## 11. Monitoring and Review

The Register of Interests is reviewed annually by the Trustees.

This policy links to the IMG Business Code of Conduct which can be accessed [here](#).

This policy links to the IMG Anti-Bribery and Corruption Policy which can be accessed [here](#).

This policy will be reviewed every **two years** or sooner if required by changes in legislation or operational needs.

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