

# **St Cuthbert's Society Junior Common Room (1168134)**

## **Conflict of Interest Policy (Trustees)**

**POL008**

|                       |              |                  |                     |
|-----------------------|--------------|------------------|---------------------|
| <b>Approved/issue</b> | October 2018 | <b>Locations</b> | Website             |
| <b>Review Cycle</b>   | Annual       |                  | Trustee Share Drive |

|                        |                         |                            |          |
|------------------------|-------------------------|----------------------------|----------|
|                        |                         |                            |          |
| <b>Next review due</b> | October 2019            | <b>Circulation details</b> | Trustees |
| <b>Review by</b>       | Trustee Legal Committee |                            |          |

## **1. Why We Have a Policy**

- 1.1. Trustees have a legal obligation to act in the best interests of the charity and in accordance with the constitution.
- 1.2. Conflicts of interest may arise where an individual's personal or family interests and/or loyalties conflict with those of the JCR. Such conflicts may create problems; they can:
  - Inhibit free discussion;
  - Result in decisions or actions that are not in the interests of the JCR; and
  - Risk the impression that the JCR has acted improperly.
- 1.3. The aim of this policy is to protect both the JCR and the individuals involved from any appearance of impropriety.

## **2. Register of Interests**

- 2.1. In accordance with Charity Commission guidance, Trustees are asked to declare their interests and any gifts or hospitality received in connection with their role. A declaration of interests form is attached (Appendix 1) for this purpose, listing the types of interest to be declared.
- 2.2. To be effective, the declaration of interests needs to be updated annually and also when any changes occur.
- 2.3. If Trustees are not sure what to declare, or whether/when a declaration needs to be updated, they are encouraged err on the side of caution or to seek confidential guidance from the Chair of Trustees.
- 2.4. Interests will be recorded on the charity's register of interests, which will be maintained by the Vice-Chair of Trustees. The register will be accessible by the Chair and Vice-Chair.

## **3. Data Protection**

- 3.1. The information provided will be processed in accordance with data protection principles. Data will be processed only to ensure that Governors act in the best interests of the College. The information provided will not be used for any other purpose, will be stored securely and will be kept confidential to the Chair and Vice-Chair of Trustees.

## **4. What to do if there is a Conflict of Interest**

- 4.1. A trustee must absent himself or herself from any discussions of the charity trustees in which it is possible that a conflict of interest will arise between his or her duty to act solely in the interests of the CIO and any personal interest (including but not limited to any financial interest).
- 4.2. Any charity trustee absenting himself or herself from any discussions in accordance with

this policy must not vote or be counted as part of the quorum in any decision of the charity trustees on the matter.

- 4.3. A trustee must also declare the nature and extent of any interest, direct or indirect, which he or she has in a proposed transaction or arrangement with the JCR or in any transaction or arrangement entered into by the JCR which has not previously been declared.
- 4.4. Trustees may, however, participate in discussions from which they may indirectly benefit, for example where the benefits are universal to all users, or where the benefit is minimal.
- 4.5. If a Trustee fails to declare an interest that is known to the Chair/Vice-Chair of Trustees the Chair or Vice-Chair will declare that interest.

## **5. Managing Contracts**

- 5.1. If a Trustee 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.

## **6. Updates and Review**

- 6.1. The register of interests will be updated on an annual basis.
- 6.2. The policy will be reviewed on an annual basis by the Trustee Board.

**This Conflict of Interest Policy (Trustees) has been approved by the JCR President and Trustee Board.**

Signed Tim Chapman

Signed Amy Kuner

Dated June 29<sup>th</sup> 2019

Dated June 29<sup>th</sup> 2019

**Chair, JCR Trust 2018-2019**

**JCR President 2018-19**

## **Appendix I – Declaration of Interests Form**

[Please see overleaf]

## Declaration of Interests Form

I, ..... as a Trustee of St Cuthbert's Society Junior Common Room have set out below my interests in accordance with the JCR's Conflict of Interest Policy (Trustees).

| <b><u>Category</u></b>                                                                                              | <i>Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family or some other close personal connection.<br/>(Use a continuation sheet if necessary.)</i> |
|---------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Current employment and any previous employment in which you continue to have a financial interest.                  |                                                                                                                                                                                                                              |
| Appointments (voluntary or otherwise) e.g. governorships, directorships, local authority membership, tribunals etc. |                                                                                                                                                                                                                              |
| Membership of any professional bodies.                                                                              |                                                                                                                                                                                                                              |

|                                                                                                                                                   |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <p>Gifts or hospitality offered to you, as a Trustee, by external bodies and whether this was declined or accepted in the last twelve months.</p> |  |
| <p>Do you use the services of the JCR, or are you a parent, guardian or close relative of a beneficiary?</p>                                      |  |
| <p>Any contractual relationship with the JCR.</p>                                                                                                 |  |
| <p>Any personal relationships with a JCR employee.<sup>1</sup></p>                                                                                |  |

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<sup>1</sup> A personal relationship requiring disclosure in accordance with this policy is broadly defined as: A family or familial relationship; a business/commercial/financial relationship; or a romantic/intimate relationship.

|                                                        |  |
|--------------------------------------------------------|--|
| Any other conflicts that are not covered by the above. |  |
|--------------------------------------------------------|--|

To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the Conflicts of Interest Policy (Trustees) and for no other purpose.

Signed .....

Date.....