

BATTLE SCARS CIO CONFLICT OF INTEREST POLICY

Introduction	
Organisation	Battle Scars
Scope of policy	Applies to all trustees
Policy operational date	02/07/24
Policy prepared by	Jenny Groves – CEO
Reviewed:	-
Amended	-
Date approved by Board	01/07/24
Policy review date	By 31/07/25 Every 2 years or
Distributing	This policy will be available on the Battle Scars website. It will be a requirement for all trustees and staff to read the policy after appointment or after its review. A summary of all relevant policies will be included in the volunteer handbook with clear signposting to the full text. Volunteers will be kept up to date with any changes that might affect their role.
Introduction	
Policy Statement	<p>Battle Scars Board of Trustees will ensure it meets its legal and good practice responsibilities to manage conflicts of interest in line with its governing document.</p> <p>Battle Scars recognises that its trustees are required to manage conflicts of interest as part of their legal duty to act in the charity's best interest at all times. This includes decision-making that is based only on what is best for the charity.</p> <p>For Battle Scars trustees, it means avoiding putting themselves in a position where their legal duty to the charity conflicts with any personal interests or loyalty they may have to any other person or body. It also includes not receiving any benefit from the charity unless properly authorised and in the charity's interests.</p> <p>Battle Scars has agreed the procedures set out below for managing conflicts of interest in line with Charity Commission Guidance "Managing conflicts of interest in a charity".</p> <p>The guidance sets out steps that need to be taken by a trustee and the Board, including that:</p> <ul style="list-style-type: none"> • the trustee should declare the conflict of interest and follow the charity's conflict of interest procedures • the Board should take action to stop the conflict from affecting its decision-making and keep a record of conflicts of interest.

<p>Types of conflict of interest</p>	<p>There are 2 common types of conflict of interest: financial conflicts and loyalty conflicts.</p> <ul style="list-style-type: none"> • Financial conflicts - these conflicts happen when a trustee, or person or organisation connected to them, could get money or something else of value from a trustee decision (they do not include a trustee's expenses, for example, for going to a charity meeting). • Loyalty conflicts - these conflicts are not about money and happen when a charity's decision involves a person or organisation linked to a trustee (loyalty to whom may clash with responsibility to the charity).
<p>Procedure</p>	
<p>Procedures</p>	<ol style="list-style-type: none"> 1. Battle Scars Board has conflict of interest as a standing item on its agenda. 2. All decisions under a conflict of interest will be recorded by the Secretary and reported in the minutes of the meeting. The report will record: <ul style="list-style-type: none"> • the nature and extent of the conflict • an outline of the discussion • the actions taken to manage the conflict. 3. Where a trustee has an interest in a matter to be discussed at a meeting of the Board, they must: <ul style="list-style-type: none"> • declare an interest at or before discussion begins on the matter • withdraw from the meeting for that item unless expressly invited to remain in order to provide information • not be counted in the quorum for that part of the meeting • withdraw during the vote and have no vote on the matter. 4. If a trustee has any other interest which does not create a danger of bias, but which might reasonably cause others to think it could influence their decision, they should declare the nature of the interest, but may remain in the room, participate in the discussion, and vote if they wish. 5. If in any doubt about the application of these procedures they should consult the Chair. 6. The Secretary should ensure that minutes or other documents relating to an item presenting a conflict are appropriately redacted for the person facing the conflict. A balance needs to be made to ensure that the person still receives sufficient information about the activities of Battle Scars generally without disclosing such sensitive information that could place the individual in an untenable position. 7. If a trustee fails to declare an interest that is known to the Secretary or the Chair, the Secretary or Chair will declare that interest.

	<p>8. Battle Scars will aim, wherever possible, to avoid procuring goods and services from trustees. However, any trustee (or any firm or company of which they are a member or employee) may enter into a contract with Battle Scars to supply goods or services in return for a payment or other material benefit but only if:</p> <ul style="list-style-type: none"> • the goods or services are actually required by Battle Scars • the nature and level of the remuneration is no more than is reasonable in relation to the value of the goods or services • the Board’s procedure ensures (and records) that its approach meets these requirements, including how it assesses options for choosing goods or service. <p>9. The Board may choose, where a conflict of interest is more serious, to take steps to remove it. This can include:</p> <ul style="list-style-type: none"> • not pursuing a course of action • proceeding with the issue in a different way so that a conflict of interest does not arise • not appointing a particular trustee or securing a trustee resignation. <p>10. Serious conflicts of interest include, but are not limited to, those which:</p> <ul style="list-style-type: none"> • are so acute or extensive that a trustee cannot make their decisions in the best interests of the charity, or could be seen to be unable to do so • are associated with inappropriate benefit • are present in significant or high-risk decisions of the Board which cannot act because the majority of the trustees are conflicted on a particular issue • the interests of one or more of the trustees is regularly in competition with those of the charity • a trustee has a commercial interest in the charity decision. <p>11. Trustees are advised by the Charity Commission to follow its more detailed guidance for more complex or serious cases: “Conflicts of Interest A Guide-for Charity Trustees” CC29</p> <p>12. Should a trustee receive a payment or benefit in kind (in line with Battle Scars’ governing document) it will be reported in Battle Scars’ accounts and annual report (as required by the Charity Commission), with amounts for each trustee listed for the year in question.</p>
<p>Declaration of Interests</p>	<p>1. Trustees are required to record interests and any gifts or hospitality offered and received in connection with their role as trustee (of £15 or over).</p> <p>2. A Trustee Declaration of Interests Form is provided for use by Battle Scars trustees for this purpose (see APPENDIX 1), listing the types of interest they should declare.</p>

	<ol style="list-style-type: none"> 3. To be effective, the Declaration of Interests needs to be updated by trustees at least annually, and by individual trustees should any material change occur. 4. If a trustee is not sure what to declare, or whether/when their declaration needs to be updated, they should err on the side of caution and/or contact Battle Scars Chair for confidential guidance. 5. Trustee interests will be recorded on the Register of Interests (see APPENDIX 2), which will be maintained by the Secretary or delegated to the CEO. 6. The Register will be accessible to all trustees. 7. The information provided by trustees will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. 8. Data will be processed only to ensure that trustees act in the best interests of the charity. 9. The information will not be used for any other purpose.
Policy review	
Responsibility	It is the responsibility of the CEO to review this policy unless the task has been delegated to an appropriate trustee or employee before the policy review date.
Procedure	All volunteers and employees can have input in this policy's review via their supervision.
Timing	The review must be completed within a month of the review date.

Appendix 1:

Battle Scars Trustee Declaration of Interests Form

I have set out below my interest in accordance with the Battle Scars Conflict of Interest Policy.

Category	Please give details of the interest and whether it applies to you or where appropriate a connected person.
Current employment and any previous employment in which the trustee continues to have a financial interest.	
Appointments (voluntary or otherwise) e.g.: trusteeships, directorships, local authority, membership, tribunals etc.	
Membership of any professional bodies, special interest groups or mutual support organisations.	
Investment in companies, partnerships and other forms of business major shareholdings, beneficial interest where these are felt to constitute a potential conflict of interests.	
A contractual relationship with Battle Scars.	
Ownership of any property that could create a conflict of interest.	
Gifts or hospitality offered by external bodies and whether this was declined or accepted in the last twelve months.	
Any other conflicts that are not covered above where there could be perceived to be a conflict of interest	
Any other people, organisations, companies/ institutions with whom you are connected that you have not already referred to on this form	

To the best of my knowledge, the above information is complete and correct. I undertake to update on an annual basis. I give my consent for it to be used for the purposes described in this policy and for no other purpose.

Signed..... **Date**.....

Appendix 2

Battle Scars Trustee Register of Interests

Composite form to be produced when trustees' declarations have been collected.

Trustee name	Declaration

Date: