



VIABLES COMMUNITY ASSOCIATION **CONFLICT OF INTEREST POLICY**

This policy sets out how Viabtes Community Association (Hereafter 'The Association') will manage conflicts of interest arising from the operation of the Trustees' business.

Policy Statement

The Trustees have ultimate responsibility for all actions carried out by their members, contractors, and themselves. The Trustees are therefore determined to ensure the organisation inspires confidence and trust among its members, clients/guests and suppliers by demonstrating integrity and avoiding any potential or real situations of undue bias or influence in the decision making of the Trustees.

This Conflict of Interest policy respects the following principles (which are those promulgated by the Nolan Committee for use in public life):

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

The Trustees understand they have a legal obligation to act in the best interests of the organisation and in accordance with their Governing Document.

Conflicts of interest may arise where an individual's/connected person's personal interests and/or loyalties conflict with those of The Association. Such conflicts may create problems such as inhibiting free discussion which could:

- Result in decisions or actions that are not in the interests of The Association and
- Risk the impression that the Trustees have acted improperly.

The aim of this policy is to protect both The Association and individuals involved from any appearance of impropriety.

The Declaration of Interests

Accordingly, we ask all our Trustees to declare any relevant and material interests, and any gifts or hospitality received in connection with their role within The Association.

Interests that may impact on the work of the Association and should be declared include:

- Any directorships of companies likely to be engaged with the business of The Association
- Gifts or hospitality offered to Trustees of The Association by external bodies and whether this was declined or accepted in the last twelve months
- Payment to a Trustee and/or their organisation for a service provided to The Association
- Private or personal relationships with a Contractor providing services to The Association (eg a family member, partner), or
- Any other conflicts that are not covered by the above.

A Declaration of Interests form is provided for this purpose. (APPENDIX 1)

To be clear, it is the potential, rather than the actual benefit from which the conflict of interest arises which requires authority.

To be effective, the declaration of interests needs to be completed prior to appointment, then annually or when any material changes occur. Should there be any doubt on what to declare, the Trustee should err on the side of caution.

The information will not be used for any other purpose. Signing the Declaration of Interest form will also signify the Trustees' consent to their data being processed for the purposes set out in this policy, in accordance with the Data Protection Act 1998.

Managing Conflicts of Interests during meetings

Any Trustee who has a financial interest in a matter under discussion, should declare the nature of their interest and withdraw from the room, unless they have a dispensation to speak.

If a Trustee has any interest in the matter under discussion, which creates a real danger of bias, that is, the interest affects them, or a member of their family or household, more than the generality affected by the decision, should declare the nature of the interest and withdraw from the room, unless they have a dispensation to speak.

If a Trustee has any other interest which does not create a real 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.

If a Trustee is in any doubt about the application of these rules they should consult with the Chair.

Policy Date: March 2023

To be reviewed: March 2024

APPENDIX 1 of the VIABLES COMMUNITY ASSOCIATION Conflict of Interest Policy to be signed by all Trustees and reviewed annually. Any changes to be made can and should be made at any time.



VIABLES COMMUNITY ASSOCIATION

CONFLICT OF INTEREST DISCLOSURE FORM

Name (please print)

Date

Position

It is the policy of VIABLES COMMUNITY ASSOCIATION (Hereafter THE ASSOCIATION or The Association) to address how issues of actual, potential, and perceived conflicts of interest involving trustees, officers, and employees of THE ASSOCIATION should be identified, disclosed, and managed. This form is designed to identify and disclose known conflicts to responsibly manage them.

Declaration:

I have read THE ASSOCIATION's Conflict of Interest policy approved by the Trustees and understand that as an employee/Trustee it is my obligation to act in a manner which promotes the best interests of The Association, and to avoid conflicts of interest when making decisions and taking actions on their behalf.

My answers on this disclosure form are stated correctly and to the best of my knowledge and belief. Should a possible conflict of interest arise in my responsibilities to The Association, I recognise that I have the obligation to notify, based on my position, the appropriate designated individual (Chairman or Centre Manager), and to abstain from any participation in the matter until THE ASSOCIATION can determine whether a conflict exists and how such conflict shall be resolved. If any relevant changes occur in my affiliations, duties, or financial circumstances, I recognise that I have a continuing obligation to file an amended "Conflict of Interest Disclosure Form" with the appropriate designated office.

I understand that the information on this form is solely for use by VIABLES COMMUNITY ASSOCIATION and is, therefore, considered confidential. Release of this information within The Association will be on a need-to-know basis only. Release to external parties will be only when required by law.

Signature

Date

**Please complete the following questions, adding additional pages as needed.
and submit this form to the Chair/Manager of VIABLES COMMUNITY ASSOCIATION**

Are you, or a member of your immediate family, an officer, director, trustee, partner (general or limited), employee or regularly retained consultant of any company, firm or organisation that presently has business dealings with The Association, or which might reasonably be expected to have business dealings with The Association in the coming year?	Yes/No (please circle) If yes, please provide details.
Do you, or does any member of your immediate family, have any financial interest, direct or indirect, in a company, firm or organisation which currently has business dealings with The Association, or which may reasonably be expected to have such business dealings with The Association in the coming year?	Yes/No (please circle) If yes, please provide details.
Do you, or any member of your immediate family, have financial or personal interest in an entity in which The Association has a financial or other vested interest?	Yes/No (please circle) If yes, please provide details.
Have you, or an immediate family member, accepted gifts, gratuities, lodging, dining, or entertainment that might reasonably appear to influence your judgment or actions concerning the business of The Association?	Yes/No (please circle) If yes, please provide details.
Do you have any other interest or role in a firm or organisation, where that interest or relationship might reasonably be expected to create an impression or suspicion among the public having knowledge of your acts that you engaged in conduct in violation of your trust as a trustee or staff member?	Yes/No (please circle) If yes, please provide details.

If any material changes to the responses provided on this disclosure form occur at any time, the trustee or employee is required to update the information on this form in writing and submit the update to the Chair/Centre Manager of The Association.

Form reviewed by:

Remedial Action(s) to be taken:

Viables Community Association will follow-up on all recommended actions to ensure compliance.