



The Gatton Trust Limited

Conflict of Interest Policy

This policy was originated by Diana Bromley

It was reviewed and Agreed on 15th January 2018

It is next due for re-approval during Autumn 2019

1 Definition

A 'conflict of interest' arises when the best interests of an individual trustee are, or could be, different from the best interests of the charity itself.

This may be something that affects the trustee directly, or indirectly, through a family member or friend or business partner.

2 Statement of Intent

The Gatton Trust Limited ("Gatton Trust") is committed to ensuring its decisions and decision-making processes are, and are seen to be, free from personal bias and do not unfairly favour any individual connected with the charity.

3 Policy

It is the policy of Gatton Trust to:

- ensure every trustee understands what constitutes a conflict of interest and that he/she has a responsibility to recognise and declare any conflicts that might arise
- document any conflict(s) and the action(s) taken to ensure that the conflict does not affect the decision making of the organisation

4 Procedure

4.1 When a trustee identifies that he/she has a potential conflict of interest he/she must:

- declare it as soon as he/she becomes aware of it
- ensure it is entered in the register of interests (ongoing conflicts), or is minuted in the appropriate board papers (one-off conflicts)
- with the agreement of other members of the Board, may take part in board discussions relating to the matter **but**
- may not take part in any decision making related to the matter
- may not be counted in the quorum for decision making related to the matter

4.2 In the interests of frank and open discussion, a trustee affected by a conflict of interest may be asked to leave the room while related discussion / decision making is taking place, unless there is good reason for them to stay.

4.3 The minutes should state:

- the declared conflict
- whether the trustee left the room, or the reason they were allowed to stay
- whether the trustee took part in discussion
- that the trustee did not take part in the decision making on the matter
- that the meeting was quorate (not counting the affected trustee)
- any other actions taken to manage the conflict

4.4 If a trustee is unsure what to declare, he/she should err on the side of caution and discuss the matter with the Chairman for confidential guidance.