

**THE PAROCHIAL CHURCH COUNCIL OF THE
ECCLESIASTICAL PARISH OF ST GEORGE'S
HANWORTH**

REGISTERED CHARITY NUMBER 1132311

**CONFLICT OF INTERESTS
POLICY**

January 2019

Preamble

The Parochial Church Council of the Ecclesiastical Parish of St George's Hanworth ('the PCC') is a legally constituted charity, and its members, the 'charity trustees', must act in the best interests of the charity. Amongst other things, they are required to avoid anything that prevents decisions being taken by reference to other considerations. Members of the PCC, as charity trustees, should avoid putting themselves in a position in which their duty to act only in the best interests of the charity could conflict with any personal interest they may have.

Therefore:

- individual charity trustees must identify and declare any conflict of interest on their part; and
- the charity trustees commit to putting in place arrangements in that enable conflicts of interest to be identified and dealt with effectively.

The early identification of conflicts of interest ensure that individual charity trustees and the charity trustees collectively do what is expected of them.

In forming this policy we have give due consideration to the Charity Commission's¹.

Whilst the charity trustees (ie. all the individual members of the PCC) are under a legal obligation to act in the PCCs best interests, the church does not operate in a vacuum: both it and its members form an integral part of the life of the community. This can give rise to conflicts of interest for individual members of the PCC where the best interests of the PCC may be at odds with those of other community organizations. And other conflicts of interest may arise from personal or family circumstances.

Conflicts of interest can take many forms. Some will make it inappropriate for the individual to participate in a discussion or decision; others may simply need to be identified and declared, so allowing the individual to continue to contribute their experience and expertise to the matter at hand.

Policy

1. This policy applies to all members of the PCC, the Standing Committee and any other committees or working parties set up by the PCC.
2. A conflict of interest is any situation in which a member's personal interests or loyalties could prevent, or could be seen to prevent, the member from making a decision only in the best interests of the PCC. Such a situation may arise either:
 - (a) where there is a potential financial benefit to a member, whether directly or indirectly through a connected person (such as a close family member or business partner); or
 - (b) where a member's duty to the PCC may compete with a duty of loyalty he or she owes to another organization or person (eg by virtue of being a trustee or committee member of a body which has an interest in the matter).
3. It is desirable that any conflicts of interest are declared to the Chair of the meeting as soon as the agenda is circulated. They must also be declared at the meeting when the relevant agenda item is reached.
4. Subject to paragraph 6, where a conflict of interest arises in connection with a personal benefit, the member concerned must withdraw from the meeting and not take part in any discussions relating to it (including discussions for the purpose of obtaining any authority from the Charity Commission that

¹ <https://www.gov.uk/guidance/manage-a-conflict-of-interest-in-your-charity>

would be required to authorize the benefit – see the *Guidance Note: PCC members and private benefit*).

5. Subject to paragraph 6, where a conflict of loyalty arises, the PCC will consider what level of participation, if any, is acceptable on the part of the conflicted member, having regard to the duty to act in the best interests of the PCC. However, the normal expectation will be that the conflicted member should withdraw from the meeting during discussion of the item of business in question.
6. A member need not withdraw from a meeting if his or her interest (whether financial or non-financial) is common to a class of persons and is neither (i) significant nor (ii) substantially greater than the interests of other members of that class.
7. The existence of a conflict of interest must be recorded in the minutes, together with the decision as to how it should be dealt with.

The Parochial Church Council of the Ecclesiastical Parish of St George's Hanworth will revise and review this policy regularly.

Approved at the PCC meeting on 07/01/2019
Review date: 01/01/2020

Signature:

Position:

Date: 07/01/2019