



Hay, Brecon & Talgarth Sanctuary for Refugees

Conflict of interests Policy Version 1.0 14 November 2018

This policy applies to Trustees, group members and volunteers

Why we have a policy

Trustees have a legal obligation to act in the best interests of Hay, Brecon and Talgarth Sanctuary for Refugees [HBTSR] and in accordance with HBTSR's governing document, and to avoid situations where there may be a potential conflict of interest. Volunteers have similar obligations. Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of the charity; or where an individual, someone related to them or someone for whom they are a carer is a beneficiary of HBTSR or its charitable activities.

Such conflicts of interest may create problems and may:

- damage the interests of or harm those whom HBTSR seeks to benefit
- lead to decisions or actions that are contrary to the charitable objects of HBTSR
- inhibit free discussion or lead to the cover-up of shortcomings or wrongdoing
- give the impression that HBTSR has acted improperly.

The aim of this policy is to reduce the risk of HBTSR itself, our officers, members and volunteers acting or appearing to act with impropriety.

Declaration of interests

Trustees and volunteers should declare their interests, and any gifts or hospitality offered and received in connection with their role in HBTSR. A declaration of interests form is provided for this purpose, which lists the types of interest which must be declared.

Each person should update their declaration of interests annually, and when any material changes occur. The declaration should include a record of all gifts and hospitality with a value of £20 or more.

If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If in doubt, please contact HBTSR's Secretary (Ailsa Dunn on hbts4refugees@gmail.com) or Chair (Margaret Blake tanyllan2@gmail.com).

The Secretary shall compile the individual declarations of interest into a Register of Declared Interests, accessible on request by any member of the public or interested organization.

Data protection

All conflict of information provided by individuals will be processed in accordance with data protection principles as set out in the Data Protection Act 1998.

Conflict of Interest data will be recorded and retained only for the purposes specified in this policy. The information provided will not be used for any other purpose.

What to do if you face a conflict of interest

If you believe you have or may appear to have a real or potential conflict of interest you should:

- declare the interest at the earliest opportunity;

- notify the Chair of any meeting where related matters are being discussed;
- withdraw from discussions and decisions in which your interest may be or appear to be involved, unless specifically asked by the Chair to remain, e.g. to provide information – any such exception should be minuted;
- abstain from voting on any related matter;
- be excluded from any quorum required for the meeting where the matters are being discussed;
- not be involved in managing or monitoring any contract in which you have an interest.

What the HBTSR officers should do

The Secretary and/or Chair should:

- Circulate Declaration of Interest forms and ensure they are updated;
- Maintain the register of Declared Interests;
- Be aware of any conflicts of interest likely to arise from items on the meeting agenda and notify individuals involved before the meeting or discussion of the item;
- Notify those attending a meeting of any anticipated conflicts of interest;
- Minute explicitly any conflicts of interest declared or notified during a meeting; any withdrawals from the meeting or voting by persons who incurring a conflict of interest; and any exceptions made, as well as the decisions reached.

Reporting conflicts of interest

Any conflicts of interest arising in the supply of services or products to the Charity or its trustees shall be reported in the annual accounts and annual report.

Where a trustee benefits from a decision, this will be reported in the annual report and accounts in accordance with the current Charities SORP.

All payments or benefits in kind to trustees will be reported in the charity's accounts and annual report, with amounts for each trustee listed for the year in question.

Independent external moderation will be used where conflicts cannot be resolved through the usual procedures.



Hay, Brecon & Talgarth Sanctuary for Refugees

Declaration of Interests form

I, _____

as Officer?Trustee /Volunteer [delete as appropriate] of Hay Brecon and Talgarth Sanctuary for Refugees, set out below my interests in accordance with the Conflicts of Interest Policy

Category	<i>Please give details of the interest and whether it applies to you or a member of your immediate family, connected persons or some other close personal connection</i>
Current employment or any previous employment in which you continue to have a financial interest	
Appointments (e.g. as trustee, director, owner, supplier, Local Authority member, etc.)	
Membership of professional bodies, special interest groups or mutual support organisations	
Investments in unlisted companies , partnerships and other forms of business, major shareholdings and beneficial interests	
Gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last 12 months	
Do you use or do you care for a user of the organisations services?	
Any contractual relationship with the charity	
Any other conflict 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 and for no other purpose.

Signed: _____ Date: _____