

# CONFLICTS OF INTEREST

**Church:** ST MARY MAGDALENE  
Ashton-on-Mersey

**Address:** 44 MOSS LANE  
SALE  
M33 6GD

**Policy Date:** MARCH 2019

**Review Date:** MARCH 2022

## **Why we have a Policy**

It is the policy of the Parochial Church Council (the PCC) to establish, maintain and enforce the highest standards of integrity and fairness in all its dealings. Employees and PCC members (the Trustees) are required to observe the highest standards of business and personal ethics in the discharge of their duties and whilst promoting the interests and objectives of the PCC. It is the obligation of employees and trustees to avoid any appearance of unethical conduct, impropriety or compromise. Employees and trustees must scrupulously avoid any conflict of interest between their responsibilities to the PCC and any other activity.

## **The Declaration of Interests**

We are asking trustees to declare their interests, and any gifts or hospitality received in connection with their role in the Church. A declaration of interests form is provided for this purpose, listing the types of interest you should declare. To be effective, PCC members will be asked to update their declaration of interests forms at least annually, and must also inform the PCC Secretary at the time any changes occur. 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 you would like to discuss this issue, please contact the PCC Secretary for confidential guidance. This register of interests shall also be used to record all gifts of a value over £20 received by the trustees and staff. Interests and gifts will be recorded on the church's register of interests, which will be maintained by the PCC Secretary.

## **Data Protection**

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2018. Data will be processed only to ensure that employees and trustees act in the best interests of the Church. The information provided will not be used for any other purpose.

## **Decisions taken where a Trustee or Employee has an Interest**

In the event of the PCC having to decide upon a question in which a trustee or employee has an interest, all decisions will be made by vote, with a simple majority required. PCC members are required to declare an interest at the start of a discussion. Interested members may not vote on matters affecting their own interests, and may be asked to leave the room.

All decisions under a conflict of interest will be recorded by the PCC Secretary and reported in the minutes of the meeting. The report will record:

- Where there is a financial interdependency between a PCC member and employee, e.g. a husband and wife;
- the nature and extent of the conflict;
- an outline of the discussion;
- the actions taken to manage the conflict.

Where a trustee benefits from the decision, this will be reported in the Annual Report and Accounts, in accordance with the current Charities Statement of Recommended Practice.

All payments or benefits in kind to trustees will be reported in the PCC's Accounts and Annual Report, with amounts for each trustee listed for the year in question. Where a member of the PCC's staff are connected to a party involved in the supply of a service or product to the PCC, this information will also be fully disclosed in the Annual Report and Accounts.

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

### **Managing Contracts**

If you have a conflict of interest, you must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.