



St. John the Evangelist and Clayton Brook Community Church

Conflict of Interest Policy

1. Introduction

Those responsible for administering a charity (PCC members in the case of a PCC body) are under a legal obligation to act in the best interests of the charity.

PCC members need to avoid putting themselves in a position in which their duty to act only in the best interests of the PCC could conflict with any personal interest they may have.

This has implications in practice for both PCC members and for the PCC body collectively:

- individual PCC members must identify and declare any conflict of interest on their part;
- the PCC body collectively must ensure that they have arrangements in place that enable conflicts of interest to be identified in a timely manner and dealt with effectively.

Failure to identify and deal with conflicts of interest can result in decisions or actions that are not in the best interests of the PCC and/or which, in the case of interests of a personal kind, can confer an unauthorised benefit on one or more members of the PCC.

2. Application

This policy applies to all members of the PCC, the Standing Committee and any other committees or working parties set up by the PCC (referred herein to as Sub-groups).

3. Policy

- a) 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 deciding only in the best interests of the PCC. Such a situation may arise either:
 - i. 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
 - ii. where a member's duty to the PCC may compete with a duty of loyalty he or she owes to another organisation or person (e.g. by virtue of being a trustee or committee member of a body which has a similar interest in the matter).
- b) It is desirable that any conflicts of interest are declared to both the PCC secretary and the Chair of the PCC meeting as soon as the agenda is circulated prior to the PCC meeting.

Conflicts of interest must also be declared at the meeting when the relevant agenda item is reached.

- c) In the case of Sub-group meetings, conflicts of interest should first be declared to the Sub-group chair prior to the meeting who must then either:
 - i. seek advice from the PCC chair as to how to proceed, or;

- ii. remove from the agenda the area of confliction and escalate to the PCC via notification to the PCC secretary.
- d) 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 that part of the agenda.
- e) Where a conflict of loyalty arises, the PCC chair will consider what level of participation, if any, is acceptable on the part of the conflicted member, having due regard 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 relevant agenda item.
- f) A member need not withdraw from a meeting if his or her interest (whether financial or non-financial) is common to a group of PCC members and is neither (i) significant nor (ii) substantially greater than the interests of other members of that group.
- g) 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.

4. Approval and Review

Approved by:	Philip Venables (Vicar)	
Policy Author:	Ed Lillie (PCC Secretary)	
Policy Owner:	PCC	
Date of Approval:	Sept 2022	
Review Date:	Sept 2023	

This document will be reviewed on an annual basis by the PCC.

5. Revision History

Version No.	Revision Date	Summary of Changes
1.0	Sept 2022	Initial version.