

Sustainable Creditor

Conflict of Interest Policy

This policy applies to all trustees, core group members and other activists acting in a decision making capacity for Sustainable Creditor.

Trustees and members acting on behalf of the organisation have a legal obligation to act in the best interests of Sustainable Creditor, and in accordance with Sustainable Creditor's constitution, and to avoid situations where there may be a potential conflict of interest. Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of Sustainable Creditor. Such conflicts may create problems that:

- inhibit free discussion;
- result in decisions or actions that are not in the interests of Sustainable Creditor; or
- risk the impression that Sustainable Creditor has acted improperly.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

The declaration of interest

Accordingly, we are asking trustees and members acting on behalf of the organisation to declare their interests, and any gifts or hospitality offered and received in connection with their role in Sustainable Creditor. A declaration of interests form is provided for this purpose, listing the types of interest you should declare.

To be effective, the declaration of interests needs to be updated at least annually, and when any material 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.

This register of interests shall be used to record all gifts of a value over £25 and hospitality over £25 received by the trustees and staff. Interests and gifts will be recorded on the charity's register of interests, which will be maintained by the charity 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 trustees act in the best interests of Sustainable Creditor. 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 a real or perceived conflict of interest you should:

- declare the interest at the earliest opportunity

- withdraw from discussions and decisions relating to the conflict.

The charity secretary should take special care to ensure that minutes or other documents relating to the item presenting a conflict are appropriately redacted for the person facing the conflict. A balance needs to be made to ensure that the person still receives sufficient information about the activities of the charity generally without disclosing such sensitive information that could place the individual in an untenable position.

If you fail to declare an interest that is known to the charity secretary and/or the chair of the board, the charity secretary or chair will declare that interest.

Decisions taken where a trustee or activist has an interest

In the event of the board having to decide upon a question in which a trustee or activist has an interest, all decisions will be made by vote, with a simple majority required. A quorum must be attained for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate. Interested board members may not vote on matters affecting their own interests.

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

- the nature and extent of the conflict;
- an outline of the discussion; and
- the actions taken to manage the conflict

Where a trustee or activist benefits from the decision, this will be reported in the annual report and accounts in accordance with the current Charities Statement of Recommended Practice.

Managing contracts

If you have a conflict of interest, you must not be involved in awarding, 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.

The Declaration of Conflicts of Interests Form is maintained by the secretary of the trustees.

Policy adopted July 2025

Appendix: Sustainable Crediton: Declaration of Conflicts of Interests Form

Sustainable Crediton Declaration of Conflicts of Interests Form

Examples of conflicts of interest which should be declared:

Financial conflicts: some common examples

Financial conflicts for a trustee happen if Sustainable Crediton is deciding whether to:

- pay the trustee for doing their trustee role (more than their expenses)
- employ or pay the trustee, or their relative, for some work at your charity, or its trading company
- sell, loan or lease charity assets (land or anything else the charity owns) to the trustee
- buy, borrow or lease charity assets from the trustee
- buy goods from a business owned by the trustee
- A conflict will also arise if a trustee receives a gift or payment from a third party as a consequence of their position as a trustee.

Loyalty conflicts: some common examples

These can happen if a decision by Sustainable Crediton involves a person or organisation linked to a trustee. For example:

- the trustee's employer
- another charity where they are a trustee
- the organisation that appointed them as a trustee
- their relatives or friends

Gifts and hospitality of a value exceeding £25

All such gifts received will also be declared.

Sustainable Crediton's Trustees will:

1. At the start of each meeting, declare any conflict of interest in relation to any agenda item. Declarations of Interest will be a standing item at the beginning of each agenda.
2. Where there is a declared conflict, the trustee in question will leave the relevant discussions, not take part in the decision or vote and will not be counted in the quorum.
3. In any case annually by the first Trustees' meeting of the calendar year, complete the Declaration of Interest form at the foot of this document, including a nil return.
4. If any conflict of interest rises in the course of the year other than arising from an agenda item, the Trustee concerned will update their Declaration of Interest and notify the other trustees of the change.

Sustainable Crediton: Trustees: Declaration of Interest	
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Date	Name:
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Declared Interests	
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Signed.....