

# Conflict of Interest Policy

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## 1. Purpose

This policy is designed to protect the integrity of Kent Community Foundation’s decision-making processes, to enable stakeholders to have confidence in our integrity, and to protect the reputation of the charity and its trustees.

Conflicts of interest may arise where a trustee, staff member, volunteer, or advisor’s personal or professional interests could interfere with their ability to make decisions solely in the best interests of the charity. Therefore they need to be managed openly and carefully. It is expected that any matter, which might be construed as a clash between personal and Kent Community

Foundation interests will be notified at the commencement of meetings and maintained on a register.

Trustees have a legal duty as company directors and charity trustees to declare interests and avoid conflicts of interest. Regard should be taken for the Charity Commission guidance on this topic: [Conflicts of interest: a guide for charity trustees \(CC29\) - GOV.UK](#)

## 2. Scope

This policy applies to:

- Trustees
- Staff members (paid or voluntary)
- Non-trustee advisers to sub-committees
- All members of grant-making committees or panels including advisers
- Contractors or consultants involved in decision-making

## 3. Definition of a Conflict of Interest

A conflict of interest arises when an individual's personal, family, or business interests, or loyalty to another organisation, could:

- Influence, or be seen to influence, their decision-making for the charity
- Result in personal benefit (financial or otherwise) from the charity's activities
- Compromise the impartial award of funding

Conflicts can be:

- Actual – a conflict exists now
- Potential – a conflict may arise in the future
- Perceived – the public or stakeholders might reasonably think a conflict exists, even if it does not

## 4. Related Parties

All board and senior staff members are asked to supply details of any Related Parties. They are required to provide the name of their spouse and if applicable the names of any close family members who could conceivably be influenced by or have influence on the board or staff



member, and a list of their business interests, particularly if the related party could potentially be involved in a transaction with Kent Community Foundation.

A register of related parties is maintained by the Head of Finance and Governance, which is submitted to the charity's external auditors annually. Board and senior staff members are requested to review and update their declared interests at the end of each year.

## **5. Duty to Declare**

All individuals covered by this policy must:

1. Declare any relevant interest at the earliest opportunity and before any related discussion or decision.
2. Update declarations annually via the charity's register of interests.
3. Inform the Head of Finance & Governance, and Chair of relevant meetings if a new conflict arises during the year.

If a Trustee or staff member is not sure what to declare, or whether/when a declaration needs to be updated, they should err on the side of caution. Any queries relating to this issue can be directed to the Head of Finance & Governance, the Chief Executive, or the Chair.

The Register will only be accessible by Kent Community Foundation Trustees, its Chief Executive, Head of Finance & Governance and professional advisers appointed by the charity (including auditors and legal advisors), unless disclosure is required by law or by any appropriate regulatory body. The information provided will be processed only to ensure that trustees and staff act in the best interests of Kent Community Foundation. Related party transactions are reported to trustees quarterly with the charity's management accounts and in summary form in the annual report and accounts. The information provided will not be used for any other purpose.

All information will be processed in accordance with Kent Community Foundation's Privacy Policy.

## **6. Types of interest to be registered**

**Kent Community Foundation Charity Number: 1084361 Company Number: 4088589**

**Registered Address: Park Barn, Evegate Business Park, Ashford, TN25 6SX Registered in England and Wales**

The exact nature of the interest will vary according to personal circumstances but the following are examples of interests, which should be declared if relevant to Kent Community Foundation duties:

- Company: any relationship with a named company with which Kent Community Foundation might do business. Such interests would include:
  - i. Ownership or part ownership;
  - ii. Share-holdings or other beneficial interest such as options, warrants etc. Only share-holdings above the 3% notifiable level need be declared
  - iii. Directorships;
  - iv. Paid employment, specifying position held;
  - v. Partnership, consultancy, or close family connection.
- Self-employment: names of any client accounting for more than 5% of your total annual earned income;
- Property: freehold or leasehold ownership of any properties in which Kent Community Foundation might have an interest;
- Charities: trusteeship, governorship or membership of or employment with, any charities or voluntary organisations;
- Public appointments: paid or unpaid;
- Memberships of other associations or external bodies;
- Family: specified close family interest in any of the above. The definition of "close" would be up to the registrant to decide. It is appreciated that a declaration may be difficult to declare if information is not forthcoming from a family member.
- In all of the above, registrants are not expected to quantify the extent of a financial interest, merely the fact that one exists.

## **7. Management of Conflicts - General**

When a conflict of interest is declared:

- It will be recorded in the Register of Interests.

- The conflicted individual will withdraw from any discussion or decision-making on the related matter.

## **8. Declaration of conflicts of interest at meetings**

Declarations of interest should be made at the beginning of any Kent Community Foundation meeting where an agenda item involves a direct conflict with an individual present. 'Conflicts of Interest' will be a standing agenda item at all Kent Community Foundation Board, Sub-Committee or panel meetings. Any direct or indirect interest arising from an agenda item conflicting with an interest listed in section 4 should be declared and will be minuted. If anyone participating fails to declare a conflict of interest themselves that is known to any of the meeting members, it must be declared to the Chair by whoever perceives the conflict.

Trustees and staff are only asked to declare relevant interests (i.e. interests which, in their judgment, are relevant to, or may impact upon, their Kent Community Foundation duties).

A declaration must also be made for potentially perceived conflicts, even if the individual personally believes there is no actual conflict. This is in order to protect Kent Community Foundation and the individual's reputation and ensure Kent Community Foundation is thorough in its risk management.

## **9. Managing conflicts and recording decisions at meetings**

All conflicts and how they were handled will be documented in the minutes of the meeting, including:

- The nature of the conflict
- An outline of the discussion
- The actions taken to manage the conflict
- The outcome of the decision-making

In the event of the board having to decide upon a question in which a trustee has an interest, all decisions will be made by vote, with a simple majority required

If, in the opinion of the Chair, it is deemed appropriate, the interested party may be asked to leave the room during the discussion.

A quorum must be present 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.

In exceptional cases, the Board may decide that continued involvement is permissible if it is clearly in the charity's best interests, fully documented, and compliant with the Charity Commission's guidance.

## 10. Breaches of the Policy

Failure to declare a conflict of interest may result in:

- Formal warnings
- Removal from the board or committee (if permitted by governing documents)
- Referral to the Charity Commission where serious misconduct is involved

## 11. Review of the Policy

This policy will be reviewed annually by the Board of Trustees to ensure it remains fit for purpose and compliant with UK charity law and Charity Commission guidance.

<b>Conflict of Interest Policy</b>	
<b>Status</b>	Approved
<b>Author(s)</b>	
<b>Approved by</b>	Board of Trustees
<b>Date</b>	28/11/2025
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