



# **CONFLICTS OF INTEREST POLICY**

Document Title		
CONFLICTS OF INTEREST POLICY		
Document Author/Owner:	Responsible Person:	
Caroline Sanderson	CEO	
Approving Body:	Date of Approval:	
Governance Committee on behalf of The Board of Trustees	9.7.25	
Effective from:	Review Date:	Edition No:
1 <sup>st</sup> August 2025	June 2027	2
EITHER For Public Access? Tick as appropriate	OR For Internal Access only? Tick as appropriate	
YES <input checked="" type="checkbox"/>	YES <input type="checkbox"/>	
Summary/Description:		
<p>This document sets out guidelines and procedures for identifying, monitoring and managing actual and potential conflicts of interest of the Board of Trustees, Academic Board and Senior Leadership Team of All Nations Christian College</p> <p><i>This document has been adapted from a policy document by The Baptist Union of Great Britain (BUGB), with grateful acknowledgment.</i></p> <p><u>2025-26 v1</u>          July 25          Responsible Persons definition added and adjustments made          Updated mission statement          Amendment of typos/formatting and where College nomenclature has changed</p>		

# ALL NATIONS CHRISTIAN COLLEGE

To cultivate biblically rooted, hope-filled and culturally relevant engagement with God's mission, by training and equipping disciples of Jesus Christ in partnership with the global church.

## CONFLICTS OF INTEREST POLICY

### CONTENTS OF POLICY

1. Introduction
2. Scope
3. Definitions
4. Why we have a policy
5. What is a conflict of interest or loyalty?
6. The Declaration and Register of Interests
7. Data Protection
8. Procedure for handling a Conflict of Interest
9. Roles, Responsibilities, Policy Approval and Review
10. Policy Communication
  - Declaration of Interest Form
  - Register of Conflicts of Interest

### 1. INTRODUCTION

- 1.1. Since All Nations Christian College is a charity, it is important that those in a position to make financial or other decisions on behalf of the College should be seen to be behaving with integrity by declaring whether their personal interests or loyalties (family, employment, financial or other relationships) could compromise their judgement, decisions or actions in relation to College business. Responsible Persons and others with decision making powers should therefore familiarise themselves with the Charity Commission publication, *Conflicts of Interest: A Guide for Charity Trustees* (CC29).
- 1.2. This policy sets out guidelines and procedures for identifying, monitoring and managing actual and potential conflicts of interest.

### 2. SCOPE

This policy applies to the Board of Trustees, Academic Board and the Senior Leadership Team of All Nations Christian College.

### 3. DEFINITIONS

- **Conflict of Interest:** is a situation in which a person has a duty to more than one person or organisation but cannot do justice to the actual or potentially adverse interests of both parties. References to 'conflicts' or 'conflicts of interest' in this policy include actual and potential conflicts of interest.
- **Meeting:** a generic term for the Board of Trustees meeting, the Academic Board meeting or the meeting of the SLT
- **Responsible Persons:** anyone who needs to declare an interest, External Members of the Academic Board and members of the Senior Leadership Team and Agents who are authorised to act on behalf of College. Responsible persons may also be referred to in other policies as Related Parties.
- **SLT:** Senior Leadership Team
- **SORP:** Standard Operating Reporting Procedure

- **Trustees:** for the purposes of this document 'Trustees' refers to all members of the Board of Trustees,

#### **4. WHY WE HAVE A POLICY**

- 4.1.** ANCC is a registered charity which is governed by its Articles of Association. The Board of Trustees are charity trustees and they have a legal obligation to act in the best interests of the charity and in accordance with its governing document. The Trustees, and other Responsible Persons, must avoid situations where there may be a potential conflict of interest. Each trustee's legal duty to act only in the best interests of the charity means in practice that individual trustees who fail to declare any conflicts of interest will fail to comply with their trustee duties.
- 4.2.** The aim of this policy is to protect both the College and the individuals involved from any impropriety or the appearance of impropriety. The Charity Commission considers it good practice to implement a policy setting out the procedures the Trustees have adopted to enable conflicts to be identified and managed. The Articles of Association (Articles 6 and 22) specify how conflicts will be addressed in relation to the application of College funds and when a matter in which a trustee has a personal interest is raised at meetings.

#### **5. WHAT IS A CONFLICT OF INTEREST OR LOYALTY?**

- 5.1.** A conflict of interest is any situation in which an individual's interests, or interests that they owe to another body or person, may (or may appear to) influence their decision-making. Types of conflict of interest include but are not limited to:
- Direct financial gain or benefit e.g. payment to a Responsible Person for services provided to the charity;
  - Indirect financial gain e.g. employment by the charity of a spouse or partner of a Responsible Person;
  - Conflict of loyalties e.g. where a Responsible Person has links with one of the charity's funders.
- 5.2.** All charity trustees occupy a fiduciary position that demands high standards of trust and confidence beyond simple honesty and good faith. A charity trustee owes an obligation of undivided loyalty to the beneficiaries of the charity and to the charity itself.
- 5.3.** Key components of the primary obligation of undivided loyalty include:
- A charity trustee's duty not to place themselves in a position where they have, or may have, an interest that conflicts with their duty as a charity trustee (the "no-conflict" rule)
  - The rule that charity trustees must not make a profit from their position as a charity trustee (the "no-profit rule")
- 5.4.** These two rules are distinct but closely connected. Any potential for a charity trustee, or responsible person, to profit from their position, or to have their ability to act in the best interests of the charity influenced by conflicting loyalties, must be properly managed. Conflicts of interest may arise where an individual's personal or family interests' conflict with those of College, for example:
- A member of their family
  - Another person connected to them (e.g. spouse, child, or person in a partnership arrangement)
  - An organisation which employs them
  - Another charity of which they are a charity trustee
  - Another body which has appointed them as a charity trustee of the charity
- 5.5.** Such conflicts can create problems by:
- inhibiting free discussion

- resulting in decisions that are not in the best interests of College
  - risking creating the impression that the College has acted improperly.
- 5.6.** The aim of this policy is to protect both the College and the Responsible Persons involved from any appearance of impropriety.

## **6. THE DECLARATION AND REGISTER OF INTERESTS**

- 6.1.** Responsible Persons are required to declare their **interests** (on appointment or as soon as is practicable), and any **gifts** or **hospitality** received in connection with their role in the charity. All Responsible Persons will be required to complete a Declaration of Interests form:
- listing any personal interests or positions that may potentially give rise to a conflict of interests or loyalty
  - confirming that they are not aware of any conflict, other than those already disclosed, that exists between their role and their personal circumstances or other interests
  - confirming that they will update the form annually, or sooner if any changes occur
  - confirming that they will declare any conflict that arises in the future.
- 6.2.** Where prospective Responsible Persons are likely to be subject to serious or frequent conflicts of interest the existing Responsible Persons will consider whether that Responsible Person should be appointed.
- 6.3.** Existing Responsible Persons are also asked to declare their interests and any gifts or hospitality received in connection with their role for College. The Declaration of Interests form should be used for this purpose, which lists the type of interests that they should declare.
- 6.4.** The Head of Finance will review the list of Related Parties at the beginning of the Autumn term.
- 6.5.** To be effective, Responsible Persons will be asked to update their Declaration on an annual basis but they should also declare any material changes as they occur. If they are not sure what to declare they should err on the side of caution and consult the Company Secretary or Chair of the Meeting to answer any questions or for confidential guidance.
- 6.6.** Interests and gifts for the Board of Trustees and SLT will be recorded on All Nations' Register of Interests which will be maintained by the College Administrator. The Academic Board administrator will be responsible for the maintenance of its own Register of Interests.

## **7. DATA PROTECTION**

- 7.1.** The information provided for the Declaration of Interests will be processed in accordance with Data Protection Principles as set out in the Data Protection Act 2018 and UK GDPR and the College Data Protection Policy.
- 7.2.** Data will be processed only to ensure that Responsible Persons act in the best interests of All Nations. The information provided will not be used for any other purpose.

## **8. PROCEDURE FOR HANDLING A CONFLICT OF INTEREST**

- 8.1.** If a Responsible Person has a perceived or real conflict of interest they should:
- declare the interest at the earliest opportunity

- consider withdrawing from discussions and decisions relating to the conflict unless the Board or members of the relevant meeting consider that it is not necessary for the Responsible Person to do so.
- 8.2.** The first item on the agenda of each Meeting will be a standing item requiring all Responsible Persons attending the Meeting to declare any conflicts of which they are aware that relate to the agenda. If a Responsible Person considers that they have an actual or potential conflict they should inform the Chair of the Meeting as soon as possible but no later than the start of the Meeting at which the relevant matter is on the agenda. If a Responsible Person considers that another Responsible Person has an actual or potential conflict that has not been declared they should inform the Chair at the start of the Meeting.
- 8.3.** The Chair will inform the meeting of any conflict declared. The non-conflicted Responsible Persons will then:
- assess the nature of the conflict
  - assess the risk or threat to Responsible Person decision making
  - decide whether the conflict is non-trivial (i.e. it is material or has the potential to be detrimental to the conduct or decisions taken by the Responsible Persons) and
  - decide what steps to take to avoid or manage the conflict.
- 8.4.** The conflicted Responsible Person must not take part in this discussion or decision and will not be counted when determining whether the Meeting is quorate at this point. If the non-conflicted Responsible Person consider that the declared conflict is trivial, they may agree that the conflicted Responsible Person may continue to participate in discussions and the decision-making process. If the non-conflicted Responsible Persons consider that the conflict is non-trivial, they will determine what action is appropriate in light of the nature and extent of the conflict.
- 8.5.** In the event of the Meeting having to decide upon a question in which a Responsible Person has an interest, all decisions will be made by vote with a simple majority required. A quorum must be present for the discussion and decision; interested Responsible Persons will not be counted when deciding whether the meeting is quorate. Interested Responsible Persons may not vote on matters affecting their own interests and may be excluded from discussions to avoid inadvertently influencing the non-conflicted Responsible Persons .
- 8.6.** All decisions under a conflict of interest will be reported in the minutes of the Meeting. The report will record:
- the nature and extent of the conflict
  - an outline of the discussion
  - the actions taken to manage the conflict.
- 8.7.** The Secretary of the Meeting (subject to any instructions from the Chair) will take 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 struck to ensure that the Responsible Person still receives sufficient information about the activities of College generally without disclosing sensitive information that could place the Responsible Person in an untenable position.
- 8.8.** Where a Responsible Person benefits from the decision this will be reported in the Annual Report and accounts in accordance with the current Charities SORP.

## **9. ROLES, RESPONSIBILITIES, POLICY APPROVAL AND REVIEW**

**9.1. The Board of Trustees** have legal oversight and responsibility for all College policies, providing leadership and active support for them and being responsible for ensuring that:

- A legally compliant and fit for purpose conflict of interest policy is in place and approved by them.
- Satisfactory arrangements are made for its effective implementation.
- The Senior Leadership Team, monitors, evaluates and periodically reviews this policy and recommends any changes to the Governance committee for approval.
- Complaints brought under the terms of this policy are managed satisfactorily by the Senior Leadership Team.
- Decision making complies with all relevant legislation and regulatory bodies.
- They receive details from the Senior Leadership Team of reported incidents and outcomes of cases (particularly where a significant impact on someone has occurred or lessons need to be learned), or of a serious incident or one which could be of reputational risk to the College which should be reported to either the Office for Students and/or the Charity Commission.

**9.2. The Governance Committee** are responsible for reviewing and approving amendments to this policy.

**9.3. The Governance Committee, Academic Board, CEO and Senior Leadership Team** are responsible for:

- The implementation and management of this policy; ensuring that procedures are implemented consistently and with clear lines of authority and actively and visibly leading the College's conflict of interest policy and practice.
- Monitoring, evaluating and periodically reviewing this policy and obtaining approval from the Governance Committee and the Board of Trustees for any changes made.
- Ensuring that the principles of this policy are included in the agenda of the Board of Trustees and its sub-boards, the Academic Board and Senior Leadership Team meetings.
- The management of complaints.
- Reporting details to the Board of Trustees of reported incidents of outcomes of cases (particularly where significant impact on someone has occurred or lessons need to be learned), or of a serious incident or of one which could be of reputational risk to the College.

**9.4. The Members of the Board of Trustees, The Finance and Resources committee, The Governance Committee, The Academic Board and the Senior Leadership Team** are responsible for:

- familiarising themselves with this policy on appointment/at induction;
- complying with and demonstrating active commitment to this policy by ensuring any conflict of interest is declared before their appointment, annually thereafter and, when applicable no later than at the start of any relevant meeting;
- if **involved in an investigation of improper conduct**, whether those making an allegation or those being accused of failings according to the terms of this policy:
  - ensuring they present their case with integrity and in a timely fashion and/or
  - ensuring they comply with any investigation and the procedures in this policy;
- managing all conflicts of interest.

**9.5. The College Administrator** will maintain and store the All Nations' Register of Interests for the Board of Trustees and the SLT. The BA Administrators will store the All Nations' Register of Interests for the Academic Board members.

**9.6. The Secretary** of any meeting, will:

- ensure that conflict of interest is a standing item on every agenda



- ensure that minutes or other documents relating to the item presenting a conflict are appropriately redacted for the person with a conflict of interest.

**9.7.** The **Chair** will manage the declaration of a conflict of interest at any meeting over which they preside.

## **10. POLICY COMMUNICATION**

**10.1.** This policy will be available to all the members of the Boards and Committees to which this policy applies.

**10.2.** This policy can be found on the Q drive for internal College staff and may be requested from the College Administrator for external members.

**10.3.** The College Administrator will make every effort to respond to any request to provide this policy in a different format. Such requests should be sent to [info@allnations.ac.uk](mailto:info@allnations.ac.uk)

**10.4.** This policy will be included with documentation provided to new members of a Board or Committee as part of the relevant board's induction procedures.

## APPENDIX 1

### ALL NATIONS CHRISTIAN COLLEGE

#### DECLARATION OF INTEREST FORM

I have set out below my interests, gifts or hospitality in accordance with All Nations Christian College's Conflicts of Interest policy.

Category	Please give details of the interest and whether it applies to yourself or a member of your immediate family, connected persons or another close personal connection
Current employment and any previous employment in which you continue to have a financial interest.	
Appointments (voluntary or otherwise) e.g. trusteeships, directorships etc.	
Membership of any professional bodies or special interest groups or in the past 4 years an officer, councillor or elected member of a public body.	
Gifts or hospitality offered to you by external bodies and whether this was accepted in the last twelve months.	
Any other conflicts or material interests that are not covered by the above.	

To the best of my knowledge, the above information is completed 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.

Full Name:

Signed:

Dated:

Position at All Nations Christian College:

## APPENDIX 2

## REGISTER OF CONFLICTS FOR (Name of Group)

Trustee – All Nations Christian College									
Member of Senior Leadership Team									
Member of Academic Board									
Trustee – All Nations Trading Co									
Trustee – Redcliffe College									
Trustee/other Directorship									
Involved in College or other employer, management									
Gifts or hospitality offered and accepted from external bodies within the last 12 months									
Other potential or actual conflict of interest									
