



Policy – Directors’ Conflicts of Interest

Contents

1. Summary	2
2. General	2
3. Register of Interests	2
4. Oral declaration of interests	3
5. Withdrawal from meetings	3
6. Influencing of other members	3
7. Violation of this Policy	3
8. Acceptance & Review	4
9. Approve & Review	4
10. Revision History	4

1. Summary

Members of Bishop's Council are the Executive Committee of the Diocesan Board of Finance. As such they are the Trustees of the DBF and have a duty to act in the best interests of the Board.

The aim of this Policy is to protect both the Bishop's Council and the individuals involved from any appearance of impropriety.

2. General

1. One important consequence of members' legal duty to act in the best interests of the Council is the need to avoid putting themselves in a position in which their duty to act only in the best interests of the Council could conflict with any personal interest they may have.
2. This has implications in practice for both members as individuals and for the Council collectively:
 - individual members must identify and declare any conflict of interest on their part; and
 - the Council collectively must ensure that it has arrangements in place that enable conflicts of interest on the part of its members to be identified and dealt with effectively.
3. The early identification of conflicts of interest is therefore key to ensuring that both individual members and the Council collectively do what is expected of them.

3. Register of Interests

4. All members should register in the members' Register of Interests (see proforma attached) any interest which might reasonably be thought by a member of the public to influence their judgement in the exercise of his or her duties as a member of the Bishop's Council.
5. In particular, members should register:
 - financial interests, whether direct or indirect; and
 - personal non-financial interests such as conflict of loyalty, including those which arise from membership of, or holding office in, Church and other bodies.
6. Examples of financial interests include:
 - stipends and/or pension entitlements from the Church of England;
 - the right to occupy housing provided wholly or partly by the Church of England; and
 - shareholdings or other financial interests (including remunerated directorships) in commercial organisations with which the Council has, or may reasonably be expected to have, a financial relationship;
7. Examples of non-financial interests include:
 - acting as a trustee or office-holder of any body (such as a theological college) whose affairs are, or

may reasonably be expected to be, materially affected by decisions of the Council; and

- acting as a trustee or office-holder of any body which seeks to influence decisions or opinion on matters relating to the Church of England.
8. Members should also consider the need to register the financial interests of persons and companies closely connected to them.
 9. The Diocesan Secretary will keep the Members' Register of Interests up-to-date and it will be open to inspection on request by Council members and by members of the Diocesan Synod. Members should review their entry in the Register of Interests at least annually. Space will be provided on the form for members to confirm that they have done so.

4. Oral declaration of interests

10. An oral declaration of a relevant interest should be made at any meeting of the Council if it is a relevant interest in the context of the particular issue under consideration; and that declaration should be recorded in the minutes of the meeting.

5. Withdrawal from meetings

11. a) Subject to paragraph (b) below, if the outcome of any discussion at a meeting of the Council could have an effect on any relevant interest of a member, that member should not participate in the discussion or determination of the matters that might affect that interest and should withdraw from the meeting.
b) A member need not withdraw from a meeting if his or her interest (whether financial or non-financial) is common to a class of persons and is neither (i) significant nor (ii) substantially greater than the interests of other members of that class.

6. Influencing of other members

12. A member should not seek to influence fellow members about a matter in which he or she has a relevant interest.

7. Violation of this Policy

All Diocesan staff are held responsible for adhering to this policy. Improper use of the facilities and resources provided which breach this policy may lead to disciplinary action under the DBF/DBE Disciplinary Policy. Serious breaches may constitute gross misconduct and may lead to action up to and including dismissal.

8. Acceptance & Review

This policy forms part of the staff policies and procedures accessible by all staff on the intranet and also brought to the attention of new staff as part of induction.

This policy will be reviewed in 12 months.

9. Approve & Review

Policy applicable to	Bishop's Council members (Trustees of the Diocesan Board of Finance)
Approved by	Bishop's Council
Approved date	27.9.2018
Policy owner	Diocesan Secretary
Next review date	Annual
Previous review date	

10. Revision History

Version No.	Revision Date	Previous Revision Date	Summary of Changes
Times			
Venue			
Attendees/Members			
In Attendance			