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## **BibleLands conflicts of interest policy**

### **Purpose**

This policy sets out a conflicts of interest policy for BibleLands. Its purpose is to protect the integrity of the Charity's decision-making process, to enable stakeholders to have confidence in the organisation's integrity, and to protect the integrity and reputation of volunteers, staff and trustees. This policy has been written in accordance with the Charity Commission guidance, "A Guide To Conflicts of Interest For Charity Trustees".

### **Detail**

All staff, volunteers, and trustees of BibleLands will strive to avoid any conflict of interest between the interests of the Charity on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

The trustees in particular, as directors of BibleLands Limited, will also act in accordance with various provisions of the Companies Act 2006 including:

- the duty to avoid conflicts of interest (s175);
- the duty not to accept benefits from third parties (s176);
- the duty to declare interests in proposed transactions and arrangements (s177); and
- the duty to declare interests in existing transactions and arrangements (s182).

Examples of conflicts of interest include:

1. A trustee who is related<sup>1</sup> to a member of staff and there is decision to be taken on staff pay and/or conditions at a committee meeting;
2. A trustee who is also on the board of another organisation that is competing for the same funding;
3. A trustee who has shares in a business that may be awarded a contract to do work or provide services for the Charity or is a director, partner or employee or related to someone who is; or
4. A trustee who has an interest in, or is otherwise connected to, an organisation which might be a beneficiary of a BibleLands grant.

Upon appointment each trustee will make a full, written disclosure of interests, such as relationships, and posts held, that could potentially result in a conflict of interest. This written disclosure will be kept on file and will be updated annually or as appropriate. Such information will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that trustees act in the best interests of Charity. The information provided will not be used for any other purpose.

In the course of meetings or activities, trustees will disclose any interests in a transaction or decision where there may be a conflict between the Charity's best interests and the trustee's best interests or a conflict between the best interests

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<sup>1</sup> A relative may be a child, parent, grandchild, grandparent, brother, sister, spouse or civil partner of the trustee or any person living with the trustee as his or her partner

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of two organisations that the trustee is involved with. If in doubt, the potential conflict must be declared anyway and clarification sought.

In the case of a conflict of interests arising for a trustee because of a duty of loyalty owed to another organisation or person and the conflict is not authorised by virtue of any other provision in the memorandum or the articles, the un-conflicted directors may authorise such a conflict of interests where the following conditions apply:

1. the Charity Commission's permission is sought before a benefit for a trustee may be authorised that is not otherwise authorised in the Charity's Memorandum of Articles or already authorised in writing from the Commission.
2. the trustee who has declared the conflict of interest withdraws from the part of the meeting at which there is discussion of any arrangement or transaction affecting that other organisation or person;
3. the trustee who has the conflict of interest does not vote on any such matter and is not to be counted when considering whether a quorum of trustees is present at the meeting;
4. the other trustees who have no conflict of interest in this matter consider it is in the interests of the Charity to authorise the conflict of interest in the circumstances applying; and
5. any such disclosure and the subsequent actions taken will be noted in the minutes.

For all other potential conflicts of interest the advice of the Charity Commission will be sought and the advice recorded in the minutes. All steps taken to follow the advice will be recorded.

While staff do not have the same statutory duty as trustees to avoid conflicts of interest, they will endeavour to follow the principles outlined in this policy, namely:

- disclosing conflicts of interests, or potential conflicts, to the CEO or chair of trustees as appropriate; and
- not accepting benefits from third parties.

This policy is meant to supplement good judgment, and staff, volunteers and trustees should respect its spirit as well as its wording.

Policy prepared by:	Jeremy Moodey, CEO
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