

SSGT Trustees and Staff Conflict of Interest Policy

Introduction

The purpose of having this policy is to provide clarity on how Trustees and staff should address any declared or perceived conflicts of interest should they arise. No policy can cover all situations, but hopefully the following will help Trustees and staff define and understand their appropriate role in the Trust's consideration and approval of grants, investments and other matters.

Conflict of interest policies assure prospective grantees and other stakeholders that no organisation has an unfair advantage in obtaining grant funds because of Trustee or staff affiliation and no Trustee or staff member will benefit unfairly from the Trust's grant funds. The absence of any *perception* of favouritism is as important as the absence of the condition itself.

Our policy approach emphasises disclosure rather than prohibition of conflicts of interest and case-by-case resolutions rather than categorical conclusions allowing ethical safeguards to be combined with operational flexibility. The Trust recognizes its staff and Trustees have broad interests and participate in many community, charitable and business activities and the broader the experience, the more value s/he is to the organisation. Staff members are also bound by Section 9.2 of the Staff Handbook requiring fulltime employees to seek approval before taking up additional employment with another organisation. It is important to note that while these guidelines refer to the grantmaking process, they apply equally to all investment and business decisions and related matters. This policy also applies to all Trust sub-committees.

Policy

The reputation and credibility of the Trust rests on its ability to make fair, objective and impartial grantmaking decisions in accordance with carefully defined criteria. Consequently, it is essential to avoid situations where a conflict of interest may influence, or appear to influence, that decision-making process.

There are two types of conflict of interest situations:

- Where a Trustee or staff member (or a relative or partner, etc.,) has a financial interest, or appears to have a financial interest, in the grantmaking decision.
- Where a Trustee or staff member has an affiliation with a grant applicant or other conflict of loyalties that may lead to or suggest influence in the Trust's decision, but no personal financial interest.

From time to time a Trustee/Staff may serve as an officer, staff member, director, trustee or consultant to an organisation under consideration for support from St Stephen's Green Trust. Situations may also arise where a Trustee's/Staff's business or personal interests may be affected by a grant decision. In all such cases, the potential for conflict of interest should be recognised and disclosed, and appropriate steps taken to prevent influence or favouritism by such Trustee/Staff in the grant decision. The Trust should also avoid any situation that might *appear* to have involved such influence or favouritism.

What to do if you face a Conflict of Interest

Where any Trustee/Staff member faces a conflict of interest or potential conflict of interest as described above, the fact of that relationship and the nature thereof shall be disclosed at the Trustee meeting where the grant or other matter is considered. Similarly if a Trustee/Staff member subsequently has an interest in a grant or other decision, it should be disclosed at the next Trustees' meeting.

Once the disclosure is made, the other Trustees at that meeting shall determine whether the conflicted Trustee/Staff member may participate in any decision in respect of that interest. In the case of a subsequent interest arising, it should be clarified there had been no undisclosed conflict of interest at the time of the grant (or other) decision. In both cases the conflict of interest / potential conflict of interest and the procedure for dealing with it should be noted in the minutes of the meeting.

Declaration of Interests

All payments or benefits from SSGT to Trustees, for example payment of expenses, are considered to be material and will be reported in the financial statements in accordance with the Charities SORP. The information to be disclosed will include: the name(s) of the transacting related party or parties; a description of the relationship between the parties (including the interest of the related party or parties in the transaction); a description of the transaction and the amounts involved.

Data Protection

Any information provided, pursuant to this policy, will be processed in accordance with our Data Protection Policy. Data will be processed only to ensure that Trustees act in the best interests of the St Stephen's Green Trust. The information provided will not be used for any other purpose.