



Conflicts of Interest Policy

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Conflict of Interest Policy**

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This policy applies to Board Directors and Officers, and staff and volunteers of Stockport Credit Union.

1. Why we have a policy

- 1.1. Directors & Officers have a legal obligation to act in the best interests of Stockport Credit Union, and in accordance with the Credit Union's governing document, and to avoid situations where there may be a potential conflict of interest.
- 1.2. Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of the Credit Union. Such conflicts may create problems; they can:
 - inhibit free discussion
 - result in decisions or actions that are not in the interests of the Credit Union
 - risk the impression that the Credit Union has acted improperly.
- 1.3. The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

2. The declaration of interests

- 2.1. Accordingly, we are asking Directors & Officers and all staff and volunteers to declare their interests, and any gifts or hospitality offered and received in connection with their role in the Credit Union. A declaration of interests form is provided for this purpose, listing the types of interest you should declare.
- 2.2. To be effective, the declaration of interests needs to be updated at least annually, and when any material changes occur.
- 2.3. If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the Chair of the Audit Committee for confidential guidance.
- 2.4. This register of interests shall be used to record all gifts of a value over £20 and hospitality over £50 received by the Directors & Officers and staff, and volunteers.
- 2.5. Interests and gifts will be recorded on the Credit Union's register of interests, which will be maintained by the Audit Committee. The register will be accessible by the Board, staff and members of the Credit Union on request.

3. Data protection

- 3.1. The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2018. Data will be processed only to ensure that Directors & Officers and all staff act in the best interests of the Credit Union. The information provided will not be used for any other purpose.

4. What to do if you face a conflict of interest

- 4.1. If you believe you have a perceived or real conflict of interest you should:
 - declare the interest at the earliest opportunity
 - withdraw from discussions and decisions relating to the conflict.
- 4.2. The Credit Union Secretary should take special care to ensure that minutes or other documents relating to the item presenting a conflict are appropriately redacted for the

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person facing the conflict. A balance needs to be made to ensure that the person still receives sufficient information about the activities of the Credit Union generally without disclosing such sensitive information that could place the individual in an untenable position.

- 4.3. If you are user of the Credit Union's services, or the carer of someone who uses the Credit Union's services, you should not be involved in decisions that directly affect the service that you, or the person you care for, receive(s). You should declare your interest at the earliest opportunity and withdraw from any subsequent discussion, unless expressly invited to remain in order to provide information. In this case you may not participate in, or influence, the decision or any vote on the matter. You will not be counted in the quorum for that part of the meeting and must withdraw from the meeting during any vote on the conflicted item.
- 4.4. There are situations where you may participate in discussions from which you could indirectly benefit, for example where the benefits are universal to all users, or where your benefit is minimal. This action will be agreed by the chair and minuted accordingly.
- 4.5. If you fail to declare an interest that is known to the Credit Union Secretary and/or the Chair of the Board, the Secretary or Chair will declare that interest.

5. Decisions taken where a Director, Officer, or member of staff or volunteer has an interest

- 5.1. In the event of the board having to decide upon a question in which a Director, Officer, or member of staff or volunteer 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 parties will not be counted when deciding whether the meeting is quorate. Interested board members may not vote on matters affecting their own interests.
- 5.2. All decisions under a conflict of interest will be recorded by the Credit Union Secretary and 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.
- 5.3. Where a Director benefits from the decision, this will be reported in the annual report and accounts in accordance with the current reporting requirements relating to Credit Unions as determined by the regulators and relevant legislators.
- 5.4. All payments or benefits in kind to Directors & Officers will be reported in the Credit Union's accounts and annual report, with amounts for each Director listed for the year in question.
- 5.5. Where a member of the Credit Union's staff are connected to a party involved in the supply of a service or product to the Credit Union, this information will be fully disclosed in the annual report and accounts.
- 5.6. Independent external moderation may be used where conflicts cannot be resolved through the usual procedures.

6. Managing contracts

- 6.1. If you have a conflict of interest, you must not be involved in managing or monitoring a contract in which you have an interest. Monitoring arrangements for such contracts will

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include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.

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Appendix 1: Specimen declaration of interests form

I as employee/Director/Officer/Volunteer* [*delete as appropriate] of STOCKPORT CREDIT UNION have set out below my interests in accordance with the organisation’s conflicts of interest policy.

Category	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family, connected persons or some other close personal connection
Current employment and any previous employment in which you continue to have a financial interest.	
Appointments (voluntary or otherwise) e.g. Directors & Officerships, directorships, local authority membership, tribunals etc.	
Membership of any professional bodies, special interest groups or mutual support organisations.	
Investments in unlisted companies, partnerships and other forms of business, major shareholdings (more than 5% of issued capital) and beneficial interests.	
Gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last twelve months.	
Do you use, or care for a user of the organisation’s services?	
Any contractual relationship with the Credit Union?	
Any other conflicts that are not covered by the above.	

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

Signed:

Position:

Date: