**The Vauxhall Band**
**Conflict of Interest Policy**

**From 22nd July 2026**

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This is the Conflict of Interest Policy of The Vauxhall Band (“we”/”our”/”us”).

The guidelines on managing conflict of interest are contained in our governing document and will be followed at all times, as will the guidance issued by the Commission listed at the end of this policy.

For the purposes of this policy, "board members" includes charity trustees/directors and any non-trustee individuals who regularly attend Board meetings or participate in Board discussions.

## Conflicts of Interest

The Board will make decisions based only on what’s best for the Charity. We do not allow personal interests, or the interests of people or organisations connected to board members, to influence these decisions.

There are 2 common types of conflict of interest:

- **Financial conflicts** - when a trustee, or person or organisation connected to them, could get money or something else of value from a trustee decision. This does not include the payment of expenses.
- **Loyalty conflicts** - other reasons, a board member might not be able to make decisions that are best for the charity.

Generally, a potential conflict of interest will occur when a board member has a connection to another organisation or person that we have a financial, or other working arrangement with, either as:

- Family – their partner, child etc or:
- Organisation – as a trustee, board member, member of staff or similar.

## Duty to Declare Interests

The charity will maintain a Register of Interests recording any relevant financial, professional, personal or other interests declared by board members. Board members will review and update their entries at least annually and whenever their circumstances change.

## Meetings

Conflicts of Interest is a standing item on all board and committee agendas; the Chair will remind Board members at the start of each meeting that any interests must be declared.

A record of any professional or personal interest that may make it difficult for a Board member to fulfil their duties impartially, or may create an appearance of impropriety, with any item on the agenda for that day's meeting is to be noted in the minutes of the meeting. Specifically:

- If a Board member is in any way, directly or indirectly, interested in a proposed transaction or arrangement with the organisation, they must declare the nature and extent of that interest to the other Board members.
- If a declaration of interest proves to be or becomes inaccurate or incomplete, a further declaration must be made.
- Any required declaration of interest must be made before the organisation enters into the transaction or arrangement.
- A declaration is not required in relation to an interest of which the Board member is not aware or where the Board member is not aware of the transaction or arrangement in question. For this purpose a Board member is treated as being aware of matters of which they ought reasonably to be aware.

If a director declares a conflict of interest, the remaining directors will determine what steps are appropriate in the circumstances. This will normally include the director withdrawing from discussion and decision-making on the relevant item and, where appropriate, leaving the meeting while the matter is considered.

## Potential Conflicts of Interest

A charity may pay and offer other material benefits to one or more of its trustees to provide services to the charity, where the trustee board reasonably believes it to be in the charity's best interests to do so. The services in question must be ones which the charity trustee provides in addition to carrying out normal trustee duties. Any such proposal, other than those approved generally by the Board, including pursuant to the Finance Delegation List, would be treated on a case by case basis and would only be approved subject to compliance with the governing document and Charity Commission guidance.

Where an individual is not part of the decision making process, there is no direct conflict of interest. However, where they have a relationship with the organisation, or individual trustee/director, the perception could arise that the trustees haven't acted in the organisation's best interests, because of this.

### Managing Conflicts of Interest

To manage these issues, the Board will ask themselves the following questions:

- Is this the best use we might make of our limited resources?
- If so, might anyone else be able to provide this service?
- If there are others, in terms of cost, quality, availability etc, who would be the best provider?

### Recording Decisions

Conflicts of interest will be recorded in the minutes, together with the key points and decision(s) made, in sufficient detail to enable a reader to understand the issue and the basis on which the decision was made.

### Version Control - Approval and Review

| Version No | Approved By | Approval Date | Main Changes | Review Period |
|---|---|---|---|---|
| 1.0 | Board | 29.12.2024 | Initial draft approved | Annually |
| 1.1 | Board | 18.07.2025 | Reviewed. No changes | Annually |
| 2.0 | Board | 22.07.2026 | Reviewed. Added provisions relating to the Register of Interests and clarification of conflict management arrangements. | Annually |

### Regulatory Guidance

Charity Commission:

- Conflicts of interest: a guide for trustees.
- Payment to trustees
- Trustee disqualification
- Examples of personal benefit