

Conflicts of Interest Policy

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Related documents:	Declarations of Interest Register, Code of Conduct, Code of Governance

1 Purpose

- 1.1 This policy states how the directors and senior staff at CHG will declare interests that could potentially put them into conflict with the company they are appointed director. It will state how the company will manage conflicts, should they arise. The policy is intended to uphold public confidence in CHG companies.

2 Policy Statement

- 2.1 A 'Conflict of interest' is where a board member stands to gain financially from any business dealings, transactions, purchases, disposals, programs or services of the organisation, other than where the board member falls into the class of people benefited by the organisation and the financial gain is of a nature common to other beneficiaries, or the person is an employee of the organisation, and the financial gain is of a nature common to other employees.
- 2.2 A conflict of interest may arise where: an immediate family or business connections of a Board member stand to gain financially from any business dealings, programs or services of the organisation; or the person is an employee of the organisation; or a board member or the ex-officio member of the Board has a role on the Board or governing body of another organisation, where the activities of that other body may be in direct conflict or competition with the activities of Cromwood Housing.
- 2.3 Board Members must ensure that their private, personal or external business interests do not influence their decisions as and that they do not use their position to obtain any personal gain of any sort. Board members should be meticulous about declaring conflicts of interest.
- 2.4 Board members are not barred from engaging in business dealings with the organisation, provided that these are negotiated at arm's length without the participation of the Board member concerned. Any sums involved or considerations to be paid must be validated by a suitably qualified external advisor, and the valuation or advice added to the Register of Interests.
- 2.5 When the Board discusses an item in which a Board Member has a direct or indirect pecuniary interest that person should declare the interest. If the conflict is clear and substantial, the Board Member should offer to withdraw (leaving the room if necessary) and take no further part in the discussion. If invited to remain, they must refrain from voting on the matter.



- 2.6 Where such a conflict is likely to recur on a frequent basis, the board member should consider whether or not they should continue to serve on one of CHG board. In the case of a dispute as to what constitutes a pecuniary interest then the Chair shall decide on what action should be taken.
- 2.7 Each Board Member is required to ensure that the Secretary has an up-to-date list of:
 - 2.7.1 all bodies trading in which he/she has an interest as a director or senior employee, a member of a firm,
 - 2.7.2 the owner or controller of more than 2% of the issued share capital in a company,
 - 2.7.3 all interests as an official or elected member of any statutory body;
 - 2.7.4 all interests as the occupier of any property owned or managed by the Company; or
 - 2.7.5 any other significant or material interest.

3 Responsibilities

- 3.1 The nominated Secretary to the Board is responsible for bringing this policy to the attention of prospective Board members. All Board members are responsible for respecting this policy and declaring under it.

4 Compliance Reporting & Monitoring

- 4.1 Contents of the conflicts of interest register shall be reported at least annually, with board members offered that opportunity to confirm that it remains accurate.
- 4.2 This policy will be subject to review no later than three years from the date of approval, or sooner if a substantial change in circumstances requires.

Declaration of Interest

In order to maintain high standards of conduct, you are asked to declare any potential conflicts of interest by completing this form. Answer the questions to the best of your knowledge and notify the Secretary should your declaration change in the future. This document is suitable for directors and employees.

You should complete this form even if you have nothing to declare.

Name

Are you, any of your relatives, or close personal friends (1) a proprietor, (2) a director, or (3) a significant shareholder of any business with which the group does (or may do) business with?

No ☐

Yes →

Name of business	
Nature of interest	
Their name	
Relationship to you	

Are you, any of your relatives, or close personal friends a director/member of (1) a public body, (2) a not-for-profit organisation, or (3) a charity that operates in the same geography of the group?

No ☐

Yes →

Name of organisation/body	
Position	
Their name	
Relationship to you	

Are any of your relatives, or close personal friends an employee of (1) a contractor, (2) a consultant, or (3) a supplier to the group?

No ☐

Yes →

Name of business	
Their name	
Relationship to you	

Are you, any of your relatives, or close personal friends residing in (1) a group owned property, (2) a group leased property, or (3) a property that the group is the managing agent for?

No ☐

Yes →

Address	
Their name	
Relationship to you	

Are any of your relatives, or close personal friends (1) a current employee, (2) a board member, or (3) a committee member of the group?

No ☐

Yes →

Their name	
Position	
Relationship to you	

Do you wish to declare an interest other than those mentioned above?

No ☐

Yes →

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What will happen to my declaration?

If you have nothing to declare, the form will be retained until it is updated, or you leave employment. Any declarations shall be recorded in a register that may be made available to the public (in such circumstances steps will be taken to mitigate privacy issues).

Where a declaration is likely to pose a conflict of interest, the Company Secretary shall raise it to an appropriate level in the group so that the conflict is understood and can be managed (you will be notified of progress and the outcome).

I declare that the content of this form is an honest reflection of my current circumstances.

Signature

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Date

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