

THE SABRE TRUST CONFLICT OF INTEREST POLICY CONTENTS

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1. INTRODUCTION

1.1 This Conflicts of Interest Policy ("the Policy") applies to the Board of Directors ("the Directors") The Trustees.

1.2 This Policy includes a register of interests and a declaration of interests form covering the Directors.

2. THE PURPOSE OF THE POLICY

2.1 The Directors of The Sabre Trust have a legal obligation to promote the charity and to act in the best interests of the organisation and in accordance with its Constitution.

2.2 Conflicts of interest may arise where the personal, professional, institutional or family interests and/or loyalties of a Director of The Sabre Trust coincide. Such conflicts can:

2.2.1 inhibit free discussion

2.2.2 result in decisions or actions that are not in the best interests of The Sabre Trust.

2.2.3 risk giving the impression that The Sabre Trust has acted improperly.

2.2.4 lead directly or indirectly to false judgements or inappropriate decisions.

2.3 The aim of this Policy is to protect the Directors and Trustees of The Sabre Trust from any impropriety or appearance of impropriety.

3. DEFINITION OF INTERESTS

3.1 Interests are defined as:-

3.1.1 Direct financial interests - where an individual stands to gain direct financial benefit from decision.

3.1.2 Indirect financial interests - where a close relative of an individual stands to benefit financially from a decision and where the financial affairs of the individual and relative in question are bound through the legal concept of 'joint purse'.

3.1.3 Non-financial interest or personal conflicts - where an individual receives no financial benefit from the decision but continues to be influenced by external factors. This includes interests arising from membership of clubs and other organisations.

3.1.4 Conflict of loyalties - where an individual may have competing loyalties between The Sabre Trust and some other person or entity.

Conflict of Interest

4. DECLARATION OF INTERESTS FOR RECORDING ON THE REGISTER OF INTERESTS

4.1 The Sabre Trust will maintain a Register of Interests (“the Register”) appropriate to its activities, which includes the interests of close family members.

4.2 The Directors shall declare their interests and any gifts or hospitality (over a value of £100) received in connection with their role in The Sabre Trust. Declarations of gifts should be made in writing to the registered office of The Sabre Trust.

4.3 New Directors are required to complete a Declaration of Interests Form on appointment and must inform Head Office when changes occur.

5. DATA PROTECTION

5.1 Personal information provided by the Directors will be processed in accordance with the TST Privacy Policy and relevant data protection legislation (GDPR). The Sabre Trust shall make notification to the Information Commissioner as may be required. Personal data will be processed to ensure that the Directors act in the best interests of The Sabre Trust and in accordance with the Constitution. The information provided will not be used for any other purpose.

6. A CONFLICT OF INTEREST

6.1 If a conflict of interest arises at a meeting of the Directors the individual who has a conflict of interest shall be obliged to declare his or her interest.

6.2 A Director shall not be involved in any decision relating to a matter in which he or she has a material interest except with permission of the Board, in which the matter arises and in accordance with this Policy.

6.3 A Director is permitted to be involved in any decision relating to a matter in which he or she has a material interest if such interest arises only by virtue of his or her status as an employee of The Sabre Trust. In such circumstances no such specific permission is required provided that a declaration of that interest has been made.

6.4 If a Director fails to declare an interest which is known to any of the other Directors then such other person may declare that interest.

7. DECISIONS TAKEN WHERE A DIRECTOR HAS AN INTEREST

7.1 A Director shall not vote at any meeting of the Board on any resolution concerning any matter in which he or she has an interest or duty which is material and which conflicts or may conflict with the interests of The Sabre Trust unless otherwise determined in accordance with this policy.

7.2 The chair of any meeting of the Board shall demit the chair for consideration of any resolution concerning any matter in which he or she has directly or indirectly an interest or duty which is material and which conflicts or may conflict with the interests of The Sabre Trust and another of those persons present shall be appointed by simple majority to take the chair for consideration of that resolution.

7.3 The relevant meeting of the Board of Directors shall decide (by way of majority vote of non-conflicted members) which of the following options should be taken, such decision to rest on the judged degree and significance of the conflict:

Conflict of Interest

7.3.1 The individual should leave the meeting while the item is being discussed.

7.3.2 The individual should be allowed to remain in the meeting while the item is being discussed, but should not be allowed to take part in the discussion or vote.

7.3.3 The individual should be allowed to speak on the item, but should not vote.

7.3.4 The individual should be allowed to speak and vote on the item.

7.4 All decisions under a conflict of interest will be recorded and reported in the minutes of that meeting. The report will record:

7.4.1 the nature and extent of the conflict;

7.4.2 the outline of the discussion;

7.4.3 the actions taken to manage the conflict; and

7.4.4 whether the person concerned was permitted to participate in consideration and vote on the matter in respect of which the conflict arose.

Additional interests and conflicts of Interest raised at a Board Meeting will be noted in the Register.

8. MANAGING CONTRACTS

8.1 If a Director has a conflict of interest, he or she must not be involved in managing or monitoring a contract in which he or she has an interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices and termination of the contract if the relationship is unsatisfactory.

9. POLICY REVIEW

This policy will be reviewed annually. Next review date: March 2021