

Conflicts of interest Policy and Procedures

August 2026

Battle Baptist Church
Being Transformed Together



Battle Baptist Church
Mount Street
Battle, East Sussex TN33 0EG

Battle Baptist Church: our conflicts of interest policy and procedures

The following resources have been used in the process of drafting this policy:

- Baptists Together guideline leaflet C16 '[Conflicts of interest](#)'
- Gov.UK's '[Managing conflicts of interest in a charity](#)'
- Gov.UK's '[Conflicts of interest: a guide for charity trustees](#)'
- DFID's '[Conflicts of interest and Gifts & Hospitality](#)' policy
- The 'Declaration of Interests for Trustees' form devised by Netherfield CofE primary school which has been amended for our purposes and is located at Annex A.
- The Conflicts of Interests policies of [Christchurch Baptist Church](#) and [High Street Baptist Church, Tring](#)

Introduction

This policy applies to all members of Battle Baptist Church (BBC), and especially to the staff team and Trustees. All Trustees and employees of BBC have a duty to act in the best interests of BBC when making decisions in their BBC roles (see also BBC's '[Code of Conduct](#)' p2: 'Integrity and ethics').

Conflicts of interest – the legal requirement

In legal terms, Battle Baptist Church is registered as a charitable Company Limited by Guarantee named 'Life with Hope Trust (LWHT).' The Trustees of LWHT are responsible for the governance of Battle Baptist Church and the fulfilment of its purposes, as set out in its Memorandum of Association (para 3.1). Trustees have a legal duty to act only in the best interests of LWHT. The law says that each individual trustee must avoid putting themselves in a position where their duty to act only in the best interests of the charitable company could conflict with any personal interest they may have. Trustees have a personal responsibility to declare conflicts of interest if they are to fulfil their legal duty.

What is a conflict of interest?

Conflicts of interest usually arise where either:

- a decision made by Trustees might lead to financial or measurable benefit to a trustee either directly, or indirectly through a 'connected person' (see note in box below);
- in considering a decision, a trustee's duty to the charity competes with a duty or loyalty that they owe to another organisation or person.

Who counts as a 'connected person'?

In broad terms, this means family, relatives or business partners of a trustee, as well as businesses in which a trustee has an interest through ownership or influence. The Charity Commission gives very clear guidance on this and details are set out in Baptists Together 'Conflicts of Interest' guidance. We will refer to this document if the need arises.

A conflict of interest exists even where there is the *possibility* that a trustee's personal or wider interests could influence his or her decision making. Even the perception of a conflict of interest could damage the reputation of LWHT.

What does Life with Hope Trust's governing document say about conflicts of interest?

Life with Hope Trust's 'Memorandum of Association' sets out principles and procedures that should be used as a guide when managing potential conflicts of interest. A summary of these is at Annex B. However, there are some points of good practice described in the BUGB leaflet C16 ('Conflicts of Interest') which are not covered adequately in LWHT's governance documents: these are detailed at Annex C. Battle Baptist Church will adopt these guidelines as part of its policy and procedures.

Managing conflicts of interest

The Charities Commission recommends following a three-stage approach (identify, prevent, record) to managing conflicts of interest so that Trustees can comply with their legal duty.

1. Identifying conflicts of interest

- a. All Trustees and employees are required to declare their interests within one month of appointment, using the form attached at Annex A.
- b. All Trustees and employees should revise their declaration of interest forms on an annual basis as necessary.
- c. Battle Baptist Church's Church Administrator will maintain a register of interests.
- d. There will be a standard agenda item at the beginning of each meeting of Trustees to declare any actual or potential conflicts of interest, in line with Charity Commission expectations.
- e. A Trustee should declare any interest which he or she has in an item to be discussed at the earliest possible opportunity, and certainly before any discussion of the item itself.
- f. If a Trustee is uncertain whether or not they are conflicted, they should err on the side of openness, declaring the issue and discussing it with other Trustees.
- g. If a Trustee is aware of an undeclared conflict of interest affecting another Trustee, they should notify the other Trustees or Chair.

2. Preventing the conflict of interest

If a conflict of interest is identified, then prevent it from affecting decision making by:

- a. Not pursuing the proposed course of action;
- b. Proceeding with the issue in a different way so that the conflict of interest does not arise;
- c. Securing the resignation of the Trustee affected by the conflict of interest;
- d. Ensuring that future Trustee appointments will not introduce a conflict of interest.

If a situation arises where the conflict of interest is so serious that Trustees are unable to make decisions in the best interest of LWHT, more advice will be sought from the sources cited at the top of this document.

In practice, a conflict of interest can usually be managed effectively by ensuring that the affected Trustee:

- does not participate in discussion about the matter (is absent from it);
- does not vote on the matter;
- is not counted when calculating whether a quorum of Trustees is present.

For more detail refer to LWHT's 'Memorandum of Association' paragraph 7.3 (p10).

3. Recording the conflict of interest

BBC will keep a written record of any conflicts of interest in the minutes of Trustees' meetings, in line with The Charity Commission's expectations. Our records will show:

- a. what sort of conflict of interest arose;
- b. which Trustee(s) or employee(s) were affected;
- c. whether any conflicts of interest were declared in advance;
- d. an outline of the discussion;
- e. whether anyone withdrew from the discussion;
- f. how the Trustees took the decision in the best interests of LWHT.

Where a Trustee, employee or church member benefits from a decision made by Trustees, this will be reported in our annual report and accounts.

Putting our policy into practice

- The Chair of Trustees, supported by one Trustee and the Church Administrator, will work together to ensure that the steps outlined above are put in place.
- The policy will be published on our website and will be made available on request to any member of, or other person connected with, the church.
- The policy and procedures will be reviewed annually and amended as necessary.
- The policy will be presented to members at the AGM each year.

First draft 9th August 2023

Revisions

Policy review 08.09.24 – none

Policy review 15.08.25 – none

Policy review 31.08.26

- a) Addition of brief introductory paragraph to make it clear that the policy applies to employees and church members as well as Trustees and to cross refer with BBC's Code of Conduct.
- b) Removal of brackets at 1a and 1b: employees should also declare any interests
- c) Correction at 3f: 'LWHT', not 'BBC'
- d) Annex A revised: 'Declaration of Interests for Trustees **and Employees**' on pp5 & 8.

Declaration of Interests for Trustees and Employees

It is important that Trustees (along with all church staff) not only act impartially, but are also seen to act impartially. The Trustees have a responsibility to avoid any conflict between their business and personal affairs and those of the church.

Declaration of Interests

The Charity Commission requires Trustees to establish and maintain a register of up-to-date business and pecuniary interests for all Trustees. Identifying and managing potential conflicts of interest means that the LWHT can demonstrate that decisions are taken without undue influence. Ensuring that Trustees do not benefit personally from decisions that they make or influence acts as an important safeguard against any suggestion of impropriety.

Declaring an interest does not necessarily stop Trustees being involved in decision making. Each declaration will be reviewed, and any conflicts of interest should be identified and managed. This may mean Trustees not taking part in certain decisions where a conflict arises.

Trustees should also declare any interest in any agenda items at the start of each meeting. Any declaration should be recorded in the minutes and then advice should be sought from the chair as to whether the Trustee should withdraw from the meeting during discussion of the agenda item. If a conflict exists, the Trustee should not vote on the item concerned.

Attached to this document is a flow chart to help with the declaration process (appendix 1) and a declaration form which can be adopted by your church (appendix 2).

Examples of Interests that should be declared

The list below provides some examples of where a conflict may arise but is not exhaustive. If you are unsure whether a conflict exists, you should declare it and seek advice from the Chair of Trustees.

- **Contracts/Suppliers**

Individuals should declare any relatives or partners, or friends who are engaged in a business, which either currently provides services to your Church, or churches with which you collaborate. This is in order to minimise the risk of suspicion that some influence may have been exerted over fellow Trustees as to the choice of provider, or that the provider gained advantage in terms of information received ahead of the contract being awarded.

- **Interests in companies and securities**

Individuals should list all companies or other bodies that are active in the church's area and in which they have a substantial interest. A company or body is active in the church's area if it has land or business in that area. An individual has a substantial interest if they own shares or other securities in the company.

- **Interests in other organisations**

Some individuals may be serving on more than one board of Trustees, if this is the case a list of all establishments where they are a Trustee should be declared.

- **Family members associated with the Church**

Individuals should give details of any family members, or a partner, involved with the church, either working as a member of staff or volunteering in a leadership position.

- **Friends or Family members applying for a position at the Church**

If you become aware of a member of the family or friend applying for a position of employment you must declare it and not be involved in the recruitment process.

- **Employment, office, trade, profession or vocation**

Individuals should declare other employment or business, regardless of whether a conflict of interest is anticipated. There may be an indirect impact on the Church.

- **Membership of Organisations**

You are required to disclose any personal interest that may conflict with the Baptist Union's interests e.g. membership of a political party.

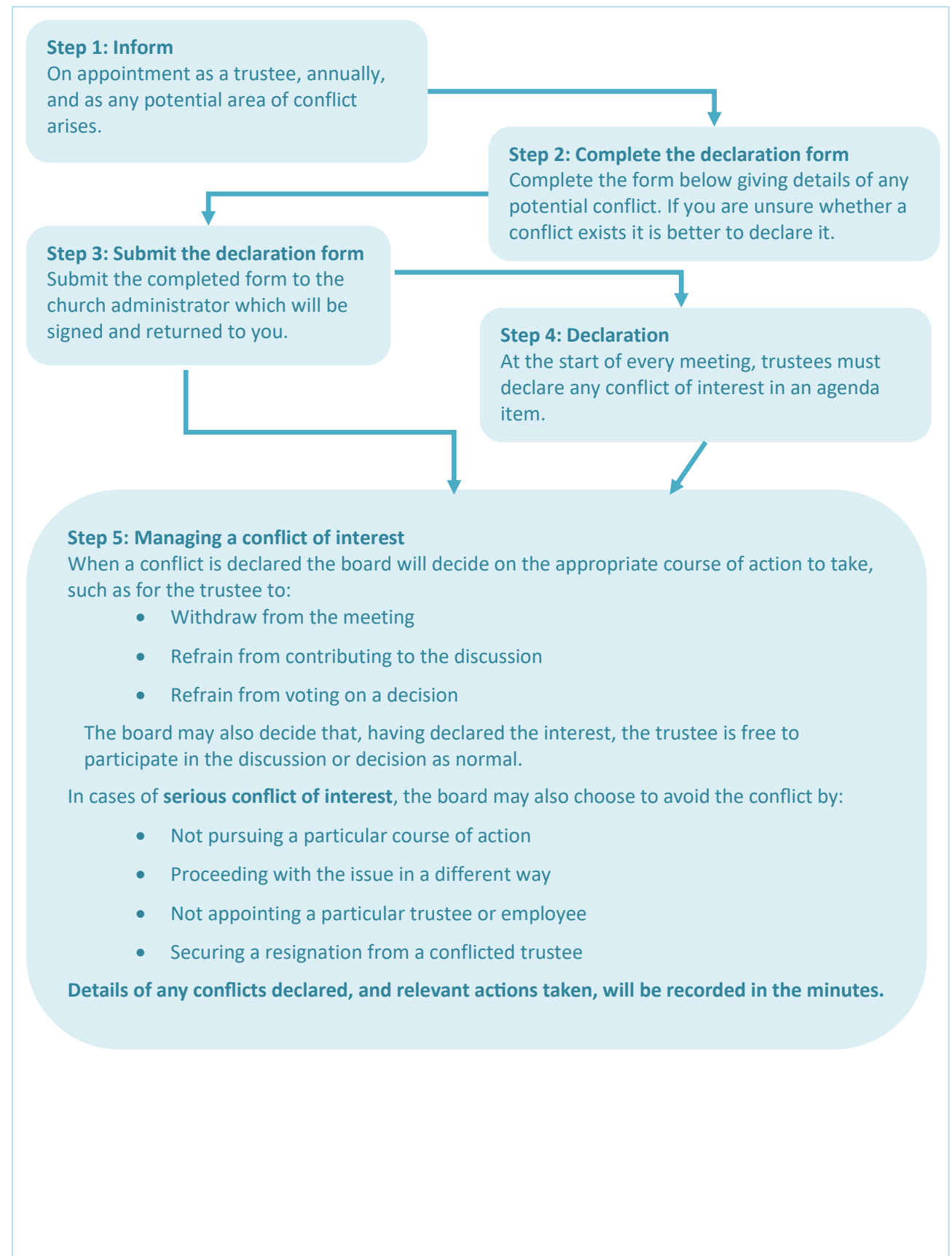
- **Criminal Offences**

You must declare if you are arrested/convicted/cautioned in respect of any offence as soon as possible. Minor driving offences such as fixed penalty notices do not need to be declared unless it results in disqualification from driving or driving is a key requirement of your role.

- **Gifts and hospitality**

LWHT recognises that Trustees will develop relationships, friendships and contacts in their personal and working lives that may influence their objectivity. The majority of these relationships will not give rise to any concern and can be regarded as a private matter. However, each Trustee is asked to declare any gifts or offers of hospitality (accepted or declined) that are valued at £25 or more. Trustees can then consider collectively whether a conflict of interest (actual, perceived or potential) has arisen.

Appendix 1: Making a Declaration



Appendix 2: Declaration of interests for Trustees and Employees

The information given on this form will be shared with the Church Administrator, the chair of the Trustee board and the Pastor, who will need to be satisfied in giving their consent that the declaration would neither interfere with the Trustee's performance or duties nor lead to any suspicion of improper influence. Each set of circumstances will be considered on an individual basis.

This form should be completed by all Trustees

Name			
Church name			
Part 1 – to be completed by the Trustee			
Please outline your declaration OR state 'Nil Return' below. It is then your responsibility to pass this form to the Church Administrator.			
Signature		Date	
Part 2 – to be completed by the Pastor and chair of Trustees			
Please detail any supporting information regarding the declaration. This should include and detail how the conflict will be managed.			
Authorised? (delete as appropriate) Yes No			
Additional comments			
Authoriser's signature			

BBC Conflicts of interest policy

What does our constitution say?

Life with Hope Trust's 'Memorandum of Association' sets out principles and procedures that should be used as a guide when managing potential conflicts of interest. A summary of the paragraphs that deal with these is set out below:

Para	Page	Summary of content
6	7, 8	'...the income and property of the Charity shall be applied solely towards the promotion of the Objects' (the 'purposes' of para 3.1). That is, - income should not be paid to members; - no Trustee shall be employed or receive any financial benefit except as set out in para 7 (see below).
6a – 6h	8	Examples of when 'payment in good faith' (para 6, line 8) <u>can</u> be paid to Trustees, members, officers, employees or connected persons.
7.1.a-c	8, 9	Reiteration of guiding principle that Trustees may not receive any financial benefit from the Charity (eg through selling of goods and services).
7.1.i-v & 7.2	9	Description of the limited conditions under which such financial benefit <u>is</u> allowable under LWHT's constitution (the 'constitutional power'). For example, where the sale of goods or services from a trustee has been approved by a resolution of the Church Members' Meeting.
7.3	9, 10	Details of procedures that Trustees must follow if they are to legitimately rely on the constitutional power (the authority) provided in para 7.2.

Additional notes on best practice for managing conflicts of interest

There are some points of good practice described in the BUGB leaflet C16 ('Conflicts of Interest') which are not covered adequately in Life with Hope Trust's 'Memorandum of Association'. These are set out below. Battle Baptist Church will follow these guidelines as part of our 'conflicts of interest policy and procedures'.

1. When goods or services are to be supplied to BBC by a Trustee or connected person, there must be a written agreement drawn up between the church and the supplier. Details of specific clauses to be included can be found on pp 4 & 5 of C16.
2. If BBC were to decide to appoint a staff member as a Trustee, it would be necessary to obtain the express permission of The Charity Commission. There is a link to a form to begin this process in C16 on page 5. Once appointed, the Trustee-employee should take no part in collective discussion or voting on the contractual terms and conditions of the employed post, or in any review of performance related to it.
3. If BBC wanted to sell or lease church property to someone who is connected to the church, such as a Trustee, a connected person or an employee, then permission will need to be obtained from The Charity Commission. There is a link to a form to begin this process in C16 on page 6.