



THE CENTRAL COUNCIL OF CHURCH
BELL RINGERS

UK Registered Charity No. 270036

Central Council of Church Bell Ringers

Conflict of Interest Policy

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Conflict of Interest Policy

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1 Summary

- 1.1. Those who share in the work of the Central Council of Church Bell Ringers (“the Council”) do so for the benefit of ringing, but many who share this work are actively involved in other charities, societies or commercial organisations.
- 1.2. This can in turn give rise to a potential Conflict of Interest, even where these other organisations have broadly similar purposes.
- 1.3. Additionally, some Council volunteers may have a potential financial Conflict of Interest because, either as individuals or as members of other bodies, they provide services to ringing and ringers, whether on a commercial or non-profit basis. This may include a business interest in the bell hanging, manufacturing, restoration or maintenance trades.
- 1.4. And last, a volunteer may have a Conflict of Interest because of the activities or financial interests of a person connected with them, including relatives, partners, business partners, or even long-standing friends.
- 1.5. This Policy deals with all those situations and is based on three simple strategies recommended by the Charity Commission (guidance document CC29 Conflict of Interest - A Guide for Charity Trustees):-
 - (a) **Identify**
 - (b) **Remove or Manage**
 - (c) **Record.**
- 1.6. This Policy applies to everyone acting on behalf of the Council in any capacity, whether as a Trustee, Office-holder or volunteer, all of whom are referred to in this Policy as “Volunteers” for ease of reference.
- 1.7. **The hardest challenge is to recognise where a Conflict of Interest exists.** It is essential that every Volunteer examines closely whether any of the work they do, the decisions they are involved in, or any of the advice they give, involves a Conflict of Interest, bearing in mind that a Conflict of Interest exists when others **might perceive it**, regardless of how those involved have acted in practice. Every Conflict which becomes apparent should be dealt with as soon as possible, following the procedures set out in this document.
- 1.8. Equally, every Volunteer must be prepared to point out an undeclared Conflict of Interest when they spot one, even where they are not personally affected, and they must be prepared to have their own undeclared Conflicts of Interest pointed out to them. This is not “whistle-blowing”. It is protecting the Council and its Volunteers from any accusation of any conflict.
- 1.9. The Charity Commission expects charities to have procedures to record each Conflict of Interest and **how it has been dealt with**. High standards of record-keeping and a culture of open-ness are essential if Council Members, ringers and the public are to have confidence in the Council as an organisation.

2 What is covered?

- 2.1. This policy applies to **everything** done by Volunteers when acting for the Council.

3 What is a “Conflict of Interest”?

3.1. A Conflict of Interest (a “Conflict”) is **any** situation in which **Personal Benefit** or **Conflicted Loyalties** could, **or could be seen to** prevent a Volunteer from acting only in the best interests of the Council.

3.2. **Personal Benefit** occurs where there is an expected financial or measurable benefit (apart from reasonable out of pocket expenses) to a Volunteer or a Connected Person.

3.3. **Conflicted Loyalties** occur where a Volunteer’s duty to the Council **could be seen to compete** with a loyalty which they or a Connected Person owe to another organisation or person. This includes loyalties established through:

- (1) employment, appointment or office;
- (2) support, entertainment or friendship; or in the case of organisations
- (3) membership.

3.4. A “**Connected Person**” is:

- (a) a close personal relative, defined as a parent, partner, sibling, child, grandchild or grandparent;
- (b) any other person in whom a Volunteer has a personal interest (or vice versa) through **association** or **influence**, including friends, relatives and colleagues; or
- (c) any organisation in which a Volunteer or an individual listed in (a) and (b) above:
 - (1) holds a position of responsibility; or
 - (2) owns at least one-fifth of the shareholding, voting rights or equivalent.

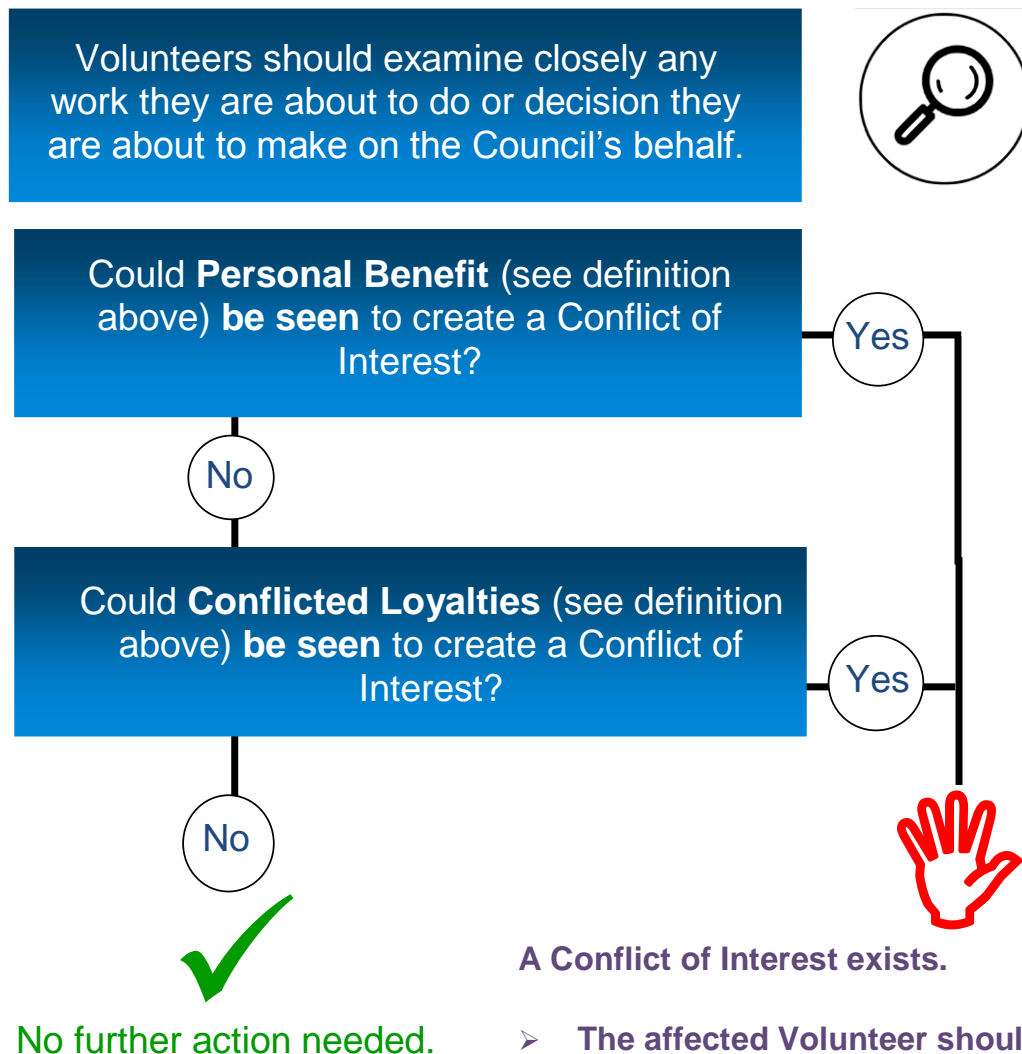
3.5. A Conflict occurs even where there is a **perception** that something could prevent a Volunteer from acting in the best interests of the Council (whether the perception is accurate or not). Deciding whether something could be seen to create a Conflict is a judgement which Volunteers make decision-by-decision. This Policy will help Volunteers judge whether a something could be seen to prevent them from acting in the Council’s best interests and if so, following the procedures set out below will ensure they do not put themselves in a position where this represents a risk to themselves or to the Council.

3.6. Failing to deal with a Conflict of Interest can result in significant harm, possibly leading to:

- (a) breach of the Trustees’ legal responsibilities;
- (b) Council decisions being challenged or invalidated by the Charity Commission or a court;
- (c) financial loss to the Council, including reimbursement of any sums improperly paid; or
- (d) reputational damage among the ringing community or the wider public.

4 Identifying a Conflict

- 4.1. Volunteers should declare:
- (a) any Conflict of Interest in connection with their own work for the Council; and
 - (b) any Conflict which they believe exists but has not been declared even if it affects someone else:



5 Removing or Managing a Conflict

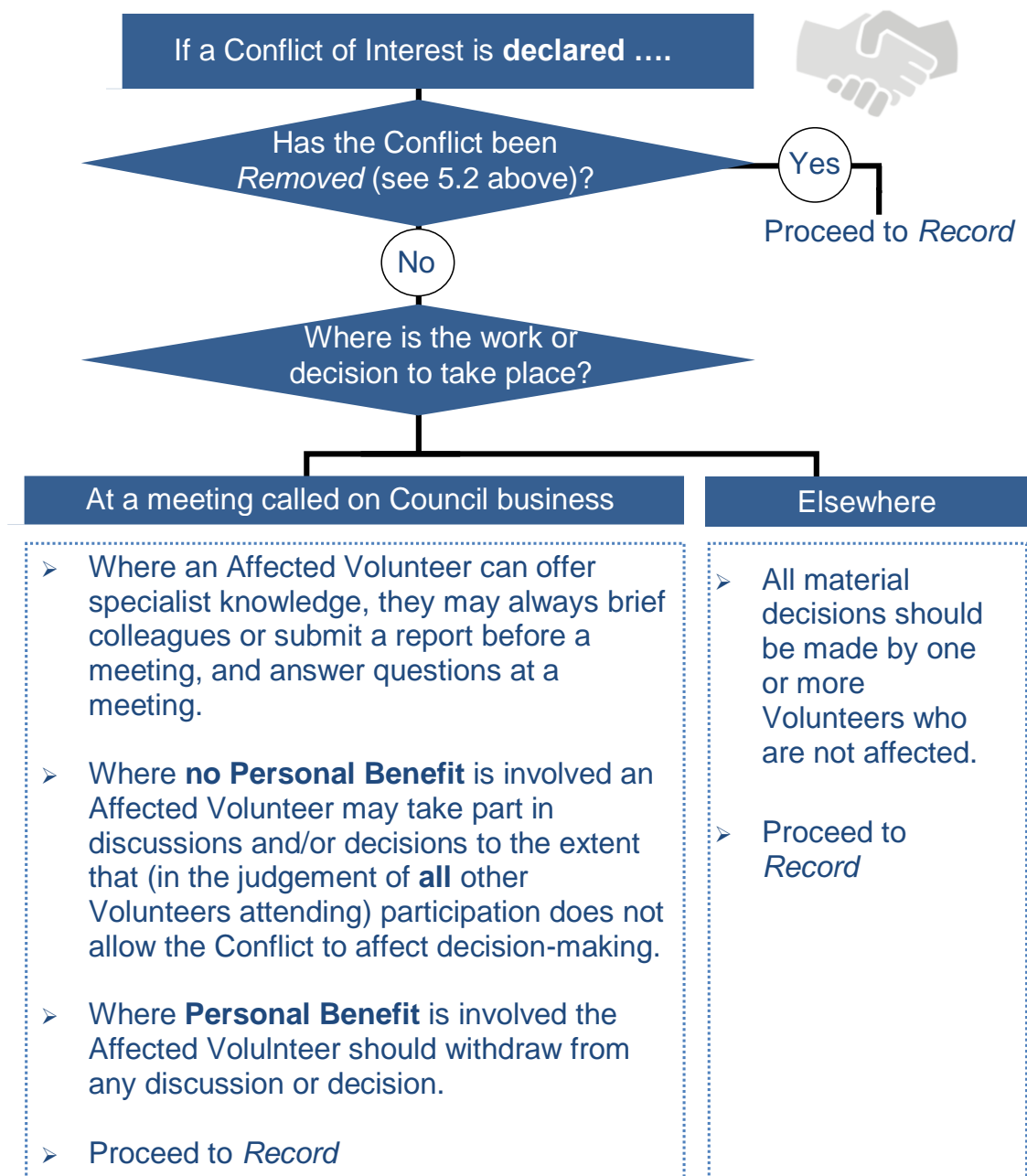
5.1. Those to whom a Conflict has been declared must ensure that the outcome is in the best interests of the Council and that the Conflict has not been allowed to affect decision making.

5.2. This should be achieved by either *Removing* or *Managing* the Conflict:

(a) A Conflict can be *Removed* in any of the following ways:

- (1) not taking the action in question;
- (2) assigning the action to someone else who has no Conflict of Interest; or
- (3) in serious circumstances where a Conflict is likely to become so acute or extensive as to impair the Council's ability to make decisions, arranging for the affected Volunteer to resign (either from the relevant role within the Council, or from the conflicting role in another organisation).

(4) A Conflict can be *Managed* by ensuring that the Conflict has not affected any material decisions which are made:



6 Recording a Conflict

- 6.1. A meeting note or minute setting out how those responsible ensured they acted in the best interests of the Council should be forwarded to the Secretary. This is the responsibility of those to whom the Conflict has been declared. A template form for this purpose is provided at Appendix 1.

7 Examples – Declaring a Conflict in advance

- 7.1. The examples in this section describe simple situations where a Conflict can be recognised and dealt with **in advance** of a decision. This is the most common scenario.

Example 1 – Purchasing recommendation by a Council Volunteer

- 7.2. A Council Volunteer with a background in public relations has been asked to give advice to a Workgroup meeting which is due to agree a new marketing strategy. The strategy involves partnership with a public relations company whose directors include the Council Volunteer's partner.
- 7.3. The Volunteer has been placed in a position where a clear **Personal Benefit** Conflict exists.
- 7.4. Resolution:
- (a) the Volunteer briefs a Workgroup Member before the meeting, submits a report in advance and attends the start of the meeting to answer questions. They declare their Conflict of Interest and, as Personal Benefit is involved, they then withdraw from the discussion and decision;
 - (b) details are recorded in the Meeting Notes, a copy of which is sent to the Secretary.

Example 2 – Conflict with another organisation

- 7.5. A Council Volunteer also acts as a co-ordinator for an educational charity, which is considering expanding its range of educational publications for ringing. Because of their specialist knowledge the Volunteer has been asked to give advice at an Executive meeting which is due to consider how far the Council should extend its own range of educational publications.
- 7.6. The Volunteer has been placed in a position where there is a clear Conflict from **Conflicted Loyalties**.
- 7.7. Resolution:
- (a) the Volunteer briefs a colleague before the meeting and declares the Conflict at the start of the meeting. As Personal Benefit is **not** involved the others present agree that the Volunteer should take part in the discussion and decision, because their role for the educational charity will not prevent them from acting in the Council's best interests;
 - (b) details are recorded in the Meeting Notes, a copy of which is sent to the Secretary.

Example 3 – Specialist advice from a Trustee

- 7.8. A Trustee has recently accepted a role as an executive director at a rope-making company, which is one of only two firms deploying a new technology. The Trustee is about to take part in an Executive meeting at which the merits and disadvantages of the technology will be discussed.
- 7.9. The Trustee has been placed in a position where a clear **Personal Benefit** Conflict exists.
- 7.10. Resolution:
- (a) the Trustee briefs a colleague before the meeting, submits a report in advance and attends the start of the meeting to answer questions. They declare the Conflict and, as Personal Benefit is involved, they then withdraw from the discussion **and** decision;
 - (b) details are recorded in the Meeting Notes, a copy of which is sent to the Secretary.

8 Examples – Declaring a Conflict after an event

- 8.1. In some circumstances, it may not be possible to recognise or declare a conflict in advance. The examples in this section describe situations where a Conflict needs to be declared as soon as possible after the event to which it relates.

Example 4 – Consultancy by a Workgroup Member

- 8.2. A Workgroup Member has just given advice on a bell restoration project for a tower at which deployment of a specific design of sound control system was recommended. Following the call to the tower, the Workgroup Member realises that the recommended design is promoted (among others) by a specialist engineer with whom the Workgroup Member has a long-standing friendship.
- 8.3. The Workgroup Member has been placed in a position where there is a clear Conflict from **Conflicted Loyalties**. Even though they did not recognise the Conflict when giving the advice, it might nevertheless **be seen** to have affected their recommendation.
- 8.4. Resolution:
- (a) the Workgroup Member declares the Conflict to their Workgroup Leader, who is not affected;
 - (b) the Workgroup Leader:
 - (1) determines that the Conflict has not been allowed to affect decision making; and
 - (2) approves the Workgroup Member's decision, but asks them to disclose the Conflict of Interest to the tower;
 - (c) the Workgroup Leader completes a Conflict of Interest Declaration, which is sent to the Council Secretary.

Example 5 – Loyalty to a Ringing Guild

- 8.5. A Workgroup Member (who is also an officer of Borsetshire Association of Change Ringers) is representing the Council at a routine meeting with the Church of England's Safeguarding Team. Although names have not been mentioned, they realise during the meeting that a case which the Safeguarding Team have just mentioned involves a member of the

Borsetshire Association. The Workgroup Member was not asked to respond at the meeting, but realises that the Safeguarding Team are likely to raise issues arising from the case in future communications.

- 8.6. The Workgroup Member has been placed in a position where there is a clear Conflict from **Conflicted Loyalties**. Whilst the Workgroup Member's personal connection with Borsetshire Association was not actually relevant to the discussion which took place, it might **be seen** to have affected the Workgroup Member's conduct at the meeting.
- 8.7. Resolution:
- (a) the Workgroup Member discusses the matter with their Workgroup Leader following the meeting with the Church of England;
 - (b) the Workgroup Leader determines that the Conflict has not been allowed to affect decision making, but it is agreed that future communications from the Safeguarding Team on the same subject will be handled by another Workgroup Member;
 - (c) the Workgroup Leader completes a Conflict of Interest Declaration, which is sent to the Council Secretary.

9 Confidentiality

- 9.1. Volunteers may not use information obtained as a result of their work for the Council for their own benefit or that of another organisation in circumstances where:
- (a) the information has been obtained in confidence; or
 - (b) disclosure would harm the Council's work or achievement of its charitable objects.

10 Enforcement

- 10.1. **The Council's Trustees** are ultimately responsible for ensuring that all those acting on behalf of the Council are aware of this Policy and their responsibilities.
- 10.2. **Workgroup Leaders** and **Stewards** are responsible for making all members of their teams or Workgroups aware of their responsibilities.
- 10.3. This Policy is governed by the Council's Rules and Standing Orders and in particular Rules 9.1 through 9.3 which deal with Conflicts of Interest and Personal Benefit.
- 10.4. Any breaches of this Policy should be reported:
- (a) to the Council's Trustees; or
 - (b) where there is good reason to believe the Trustees are unwilling or unable to resolve the matter in accordance with the Council's rules, to the Charity Commission at Whistleblowing@CharityCommission.gov.uk.

11 Notes for Trustees, Stewards and Workgroup Leaders

- 11.1. To ensure that the Council meets the high standards expected by the Charity Commission, some additional responsibilities apply to those serving as Trustees, Stewards and Workgroup Leaders.

- 11.2. These are set out in the document *Conflict of Interest Policy – Additional Notes for Trustees, Stewards and Workgroup Leaders*.

12 Changes to this policy

- 12.1. The Council keeps its policies under regular review and may make updates to this Policy accordingly. This Policy is effective from 1st October, 2020.

13 Appendix 1 – Conflict of Interest Declaration Form



Central Council of Church Bell Ringers

Conflict of Interest Declaration

Name of person(s) affected:

Name of person(s) to whom the Conflict was declared:

Type of Conflict (Personal Benefit or Personal Loyalty):

Nature of the Conflict and the decision which was affected :

Was the Conflict REMOVED or MANAGED?

How did those taking the decision ensure it was made in the best interests of the Council?

Form submitted to Secretary by:

Date: