



BEACON COUNSELLING TRUST – CONFLICT OF INTEREST POLICY & PROCEDURE

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1. INTRODUCTION

Beacon Counselling Trust (BCT) is committed to maintaining the highest standards of integrity, transparency, and accountability in all its operations. This conflict of interest policy is intended to protect BCT and its stakeholders by ensuring that conflicts of interest are properly disclosed and managed.

Trustees have a legal duty to act only in the best interests of BCT. Staff are also expected to act in a way that upholds BCT's values and avoids conflicts between personal interests and the duties of their role.

2. AIM

The aim of this policy is to ensure that all decisions and actions taken by trustees, staff, and representatives are made in the best interests of BCT, free from undue influence or personal gain. By identifying, declaring, and appropriately managing actual, potential, or perceived conflicts of interest, the policy promotes transparency, accountability, and trust in BCT's operations and governance.

3. DEFINITION

A conflict of interest occurs when an individual's personal, financial, or other interests (or those of a person connected to them) could improperly influence their decisions or actions in the course of their duties for BCT.

Conflicts may be:

- Actual – the conflict already exists.
- Potential – the conflict could arise in the future.
- Perceived – a reasonable person could believe a conflict exists.

Conflicts of interest arise where:

- There is potential financial or measurable benefit directly or indirectly to a member of staff or a trustee, through a connected person.
- A trustee or staff member has a duty to BCT that may compete with a duty or loyalty they owed to another organisation or person.

4. RESPONSIBILITIES OF STAFF AND TRUSTEES

A staff member or a trustee has a duty to act in the best interests of BCT, and anyone who does not follow this duty may be in breach of trust. All staff and trustees will sign a conflict of interest declaration form which states that they will declare any personal interest which might conflict with, or be seen by others to affect, their ability to perform their duties fairly and impartially.

(See Appendix 1)

5. SCOPE

This policy applies to all trustees, employees, and any other individuals acting on behalf of BCT.

This policy will be reviewed annually to ensure it remains appropriate for the BCT's needs.

6. PROCEDURE

6.1 Identify and Disclosure

Everyone has a personal responsibility to make a disclosure of conflicts of interest which affect them.

All staff and trustees are required to:

- Declare any interests at the start of their involvement with BCT.
- Update their declarations annually and as circumstances change.
- Disclose any new conflict as soon as it arises.

Disclosures should be made in writing using the conflict of interest declaration form and submitted to the relevant line manager, a member of the senior management team or a board member, as appropriate.

(See Appendix 2)

6.2 Managing Conflicts of Interest

When a conflict is identified, the board of trustees and/or the senior management team (as appropriate) will determine how to manage the conflict in the best interests of BCT.

A formal record of the conflict of interest, and how it was handled should be made in the minutes of the meeting. The written record should include:

- The nature of the conflict.
- Which trustee or trustees, or staff member were affected.
- Whether any conflicts of interest were declared in advance.
- An outline of the discussion.
- Whether anyone withdrew from the discussion.
- How the trustee or staff member took the decision in the best interests of BCT.

BCT will register conflicts of interest for trustees and staff.

Managing the conflict of interest may include:

- Requiring the individual to withdraw from a specific decision.
- Removing the individual from certain responsibilities.
- Seeking external advice. Further information can be found at [dealing with a conflict of interest - Search - GOV.UK](#)

7. EXAMPLES OF POTENTIAL CONFLICTS OF INTEREST

7.1 Relationships between Trustees and Staff.

It is advised that trustees do not enter a personal relationship with a member of staff. To do so could render suspect any decisions that are taken or at the very least be perceived by other members of staff as affecting how decisions are made.

A trustee who is related to or has a relationship with a member of staff employed by the organisation must not be part of any meeting where discussions take place on terms and conditions of employment or working conditions of staff, or where the member of staff directly benefits from the decision.

Bank mandates will not include the names of individuals who are related or are having a relationship as signatories.

Arrangements should be made for supervision and appraisals to be undertaken by someone other than the person who is related to or having a relationship with the individual.

7.2 Being a member of another organisation with similar objectives to the organisation or that is a purchaser of organisation services

A trustee or staff member must act in the best interests of BCT (when attending organisation meetings or meetings where they are an organisation representative), even if there is a conflict of interest with the other statutory or voluntary organisation of which he / she/ they is a member or a member of staff. Anyone who does not follow this duty may be in breach of trust.

A trustee will withdraw from a meeting of trustees where any resolution is to be made concerning a matter in which he / she/ they has, directly or indirectly, an interest or duty which is material, and which conflicts, or may conflict with the interests of BCT.

A trustee or staff member who is a member of another organisation and where, as a result there is the potential for conflict of interest, must not be part of a resolution at any meeting where discussions take place on matters of funding, or any other matter that could result in the gaining of information which could be prejudicial to BCT.

Where the board of trustees feels the individual trustee or staff member could unduly influence the outcome of a decision, they may ask the trustee or staff member to withdraw.

8. CHAIRS OF TRUSTEES

The chair has a second or casting vote, so he / she/ they is in a particularly vulnerable situation if there is a potential conflict of interest. In addition to the procedures listed above, the following must apply:

- A chair should not chair the part of the meeting where discussions take place on matters which concern his / her/ their potential conflict of interest. In such a case, the chair should withdraw from the meeting.
- Another member of the board who has no conflict of interest in the matter at hand should chair that part of the meeting; see governing documents if appropriate.

9. LEARNING AND DEVELOPMENT AND INDUCTION

It is advised that all trustees and staff have received the appropriate training over the course of their career, which enables them to effectively carry out the duties of their role, and that inductions are undertaken.

10. BREACH OF THIS POLICY

Failure to disclose a conflict of interest or to comply with this policy may result in disciplinary action and, in the case of trustees, may be reported to the Charity Commission.

All Policies and Procedures can be translated into the appropriate language

APPENDIX 1

CONFLICT OF INTEREST DECLARATION FORM

NAME

POSITION

This Conflict of Interest (COI) form is designed to help ensure the integrity and transparency of Beacon Counselling Trust (BCT). Trustees and all staff have a duty to act in the best interests of BCT. This form should be read in conjunction with the Conflict of Interest Policy.

Please complete the following questions to disclose any actual, potential, or perceived conflicts of interest. If you are unsure, disclose the information.

1. Do you have any personal, professional, or financial interests that could conflict with BCT's work?

- Yes
- No

If yes, please provide details:

2. Have you received any gifts, hospitality, or benefits from organisations or individuals that have not already been disclosed to BCT? (Do not include gifts under the value of £100)

- Yes
- No

If yes, please provide details:

3. Are you currently employed, volunteering, or consulting for any organisation in the gambling industry?

- Yes
- No

If yes, please provide details:

4. Do you or any close family member have financial or personal connections to gambling-related organisations?

- Yes
- No

If yes, please provide details:

5. Do you hold any external roles that could conflict with your responsibilities to BCT?

- Yes
- No

If yes, please provide details:

Ongoing Duty to Disclose

Conflicts of interest may arise at any time. You have an ongoing obligation to disclose new conflicts as they arise.

By signing this form, you confirm that the information provided is accurate to the best of your knowledge and that you will promptly update BCT if circumstances change.

Declaration

Name: _____

Role: _____

Signature: _____

Date: _____

Review and Acknowledgment

(To be completed by BCT)

Reviewed by: _____

Role: _____

Date: _____

Actions Taken (if any):

This form will be securely stored and reviewed annually or as circumstances change.