



Middle Marches Community Land Trust

Conflicts of Interest Policy

1. Purpose of the policy

To ensure that all Board Members, volunteers and anyone acting on behalf of the Middle Marches Community Land Trust (MMCLT) act in the best interest of MMCLT. Decisions must prioritise community benefit over personal gain, and personal interests must not influence decisions or cause reputational damage.

2. Definition of Conflict of Interest

A conflict of interest is any situation in which an individual's personal, professional, or financial interests could, or could be seen to, prevent them from making a decision only in the best interests of MMCLT.

All Board Members have a legal duty to act only in MMCLT's best interests.

3. Identifying Conflicts of Interest

Conflicts may include, but are not limited to:

- **Financial Conflicts:** Direct or indirect monetary gain from an MMCLT decision (eg, awarding a contract to a Board Member's business)
- **Loyalty Conflicts:** Competing duties to another organisation or cause that may conflict with MMCLT's goals and that could affect impartiality (eg, a Board Member serving on the board of a competing funding applicant)
- **Indirect Interests:** Benefits to a "connected person," defined broadly as family members or businesses where the Board Member holds significant influence (eg, 20% or more shareholding)

4. Declaration of Interests

- **Declaration on Appointment:** All Board Members and relevant individuals must declare any potential conflicts of interest upon appointment and update declarations as circumstances change. Declarations should be recorded in a register of interests and reviewed annually
- **Register of Interests:** MMCLT must maintain a written register where all Board Members record their external interests upon appointment and update them at least annually

- **Declaration:** Board Members must disclose any potential or actual conflict at the earliest opportunity, typically as a standing item at the start of every board meeting
- **Management:** Once declared, conflicted individuals should withdraw from discussions and voting on affected matters. The conflicted individual is not counted toward the meeting's quorum for that specific item. In cases of significant or ongoing conflict, the individual may be asked to step aside from relevant duties.
- **Minute Taking:** All declarations and the subsequent actions taken (e.g., "Board Member X left the room") must be formally recorded in the meeting minutes
- **FCA Reporting:** Significant commercial arrangements that could create conflicts must often be disclosed to the FCA during registration or as part of annual returns.

5. Receiving Gifts or Hospitality

Board Members, volunteers, and anyone acting on behalf of MMCLT must not accept gifts or hospitality that could, or appear to, influence their role. Any gifts or hospitality received should be declared to the Chair and recorded.

6. Asset Lock/Profit Rule

As a Community Benefit Society, MMCLT must operate for the community's benefit, not for member profit. Profits cannot be distributed, and assets must be locked for community use.

This policy will be reviewed every two years, or sooner if required by changes in legislation or best practice.