Declaration of Interest Policy

Approved by:	The Board of Trustees
Date of approval:	December 2025
Date of review	December 2028
Originator	Chief Executive Officer
Title	Declaration of Interest Policy
Description of document	The purpose of this policy is to protect the integrity of the organisation's decision-making process, to enable stakeholders to have confidence in the organisation's integrity, and to protect the integrity and reputation of volunteers, staff and Trustees
Scope	All Tapping House (TH) Staff & Volunteers
Author and designation	Lynn Lockheart, Director of Operations
Equality impact assessment (EIA)	Completed December 2025 with no negative impact
Associated documents	Complaints Policy Risk Management Policy Statement of Purpose Gift Acceptance and Anti-Bribery Policy Treasury Management, Investment and Reserves Policy Whistleblowing Policy
Supporting references	Charity Commission Guidance - A guide to conflicts of interest for charity Trustees
Consultation or development process	Senior Leadership Team and the Board of Trustees
Training implications	All staff, volunteers and Trustees at induction
Dissemination	This policy is kept in the S/drive of the Hospice server and a paper copy is held with the Governance and Executive Assistant. It is disseminated via team brief and team leads
Approval Process	Board of Trustees
Ratification process	Senior Leadership Team
Archiving arrangements	This document will be archived in line with the policy for procedural documents.
Review arrangements	3 years from date of publication or sooner should changes to legislation or guidance require it
Date of issue	September 2019

Version History Log

Version	Date Published	Details of key changes	Name
2	September 2019	EIA added	L Carter
3	November 2022	Minor change to align with current organisational structure.	L Lockheart
4	February 2025	Policy name change and minor amends	A O'Donnell
5	December 2025	Reviewed- minor changes	N Ellis

Contents

Policy Statement

All staff, volunteers, and Trustees of Tapping House (TH) and its subsidiaries will strive to avoid any conflict of interest between the interests of the Organisation on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest. This policy is meant to supplement good judgment, and employees, volunteers and Trustees should respect its spirit as well as its wording. There will be a requirement to declare any interests on an annual basis. This applies to all Trustees, the Directors and the Operational Managers Group.

Introduction

The purpose of this policy is to protect the integrity of the organisation's decision- making process, to enable stakeholders to have confidence in the organisation's integrity, and to protect the integrity and reputation of employees and volunteers.

Definitions

Relevant Person

- A Trustee or Board Committee member
- A Director
- Operational Managers

Declarations of Interest

A declaration of interest is any situation in which a Relevant Person's personal interests or loyalties could, or could be seen to prevent them from making a decision only in the best interests of the organisation.

Examples may include but are not definitive:

- A Relevant Person who is also a user may be faced with a decision in a committee meeting regarding whether fees for users should be introduced / increased.
- A Relevant Person who is related** to a member of staff and there is a decision to be taken on staff pay and/or conditions at a committee meeting.
- A Relevant Person who is also on the committee of another organisation that is competing for the same funding.
- A Relevant Person who is connected*** to a business that may be awarded a contract to do work or provide services for the organisation or is a Trustee, partner or employee or connected to someone who is.
- Where the Trustees decide to sell, loan or lease charity assets to a Relevant Person.

- Where the Trustees decide to acquire, borrow or lease assets from a Relevant Person.
- Indirect financial gain, such as employment by the charity of a spouse or partner of a Relevant Person, where their finances are interdependent;
- Non-financial gain, such as when a user of the charity's services is also a Relevant Person.
- Payment to a Trustee for carrying out their Trustee role.
- Payment to a Trustee for services provided to the charity.
- The employment of a Trustee in a separate post within the charity or its trading subsidiary, even when the trustee has resigned in order to take up the employment.
- Where the Trustees decide to make a grant to a service user trustee or a service user who is a related to a Trustee.

****Related to**

This means family, relatives or business partners of a Relevant Person. The term includes a Relevant Person's spouse or unmarried or civil partner, children, siblings, grandchildren or grandparents.

*****Connected to**

This means a business where a Relevant Person holds at least 20% of the shareholding or voting rights.

Responsibility/Accountability

Trustees
Trustees have overall responsibility for the governance of the organisation. Trustees will need to be able to demonstrate that any arrangement involving a potential declaration of interest is declared in the best interests of the charity and that the declaration is transparently managed. Trustees must disclose any interests in a transaction or decision where there may be a conflict between the organisation's best interests and the Trustee's best interests or a conflict between the best interests of two organisations that the Trustee is involved with.

Trustees must ensure that procedures are in place to capture and highlight potential declarations of interest e.g. by inclusion in the agenda, and that these are managed in accordance with this policy.

Trustees must ensure that there is appropriate authority in place before any decision conferring Trustee benefit is made. Failure to declare or deal transparently with a potential conflict of interest that later comes to light could have reputational issues for the organisation and risk an investigation by the Charity Commission.

Directors

Directors have delegated responsibility for implementing procedures concerning governance of the organisation.

Directors must ensure that procedures are in place to capture and highlight potential declarations of interest and that these are managed in accordance with this policy.

Directors must disclose any interests in a transaction or decision where there may be a conflict between the organisations' best interests and the Director's best interests or a conflict between the best interests of two organisations that the Director is involved with
Failure to declare or deal transparently with a potential conflict of interest that later comes to light could have reputational issues for the organisation, risk an investigation by the Charity Commission and result in disciplinary action.

Operational Managers

Operational Managers must disclose any interests in a transaction or decision where there may be a conflict between the organisation's best interests and the Operational Manager's best interests or a conflict between the best interests of two organisations that the Operational Manager is involved with.

Failure to declare a potential conflict of interest that later comes to light could have reputational issues for the organisation, risk an investigation by the Charity Commission and result in disciplinary action.

Employees and volunteers

Should be aware of and understand this policy.

Procedures and Implementation

Disclosure of interests

Upon appointment each Relevant Person will make a full, written disclosure of interests, such as relationships, and posts held that could potentially result in a conflict of interest. This written disclosure will be kept on file and will be updated annually or as appropriate. (See Appendix 1 Trustee/Employee Declaration of Interest).

In the course of meetings or activities, Relevant Persons will disclose any interests in a transaction or decision where there may be a conflict between the organisations' best interests and the Relevant Persons best interests or a conflict between the best interests of two organisations that the Relevant Person is involved with. If in doubt the potential conflict must be declared anyway and clarification sought.

Should anyone suspect a failure to declare an interest they should refer to the Whistleblowing policy.

Procedure during Board Meetings and Board Committee Meetings, Senior Leadership Meetings and other Committee Meetings

At any meeting where the subject matter leads a participant to believe that there could be a conflict of interest, this interest must be declared at the earliest convenient point in the meeting. This relates to their personal circumstances or anyone that they are aware of at the meeting.

Declarations of interests must be clearly identified within the minutes of the meeting, including any need to withdraw and reasons for not doing so.

As a rule, those with pecuniary interests whether directly or indirectly through a related person or connected business, should withdraw from the meeting and those with non- pecuniary interests could be allowed to stay, depending upon the circumstances. The meeting needs to determine whether there could be a matter of bias (any unfair regard with favour, or disfavour) in the matter. Members allowed to stay in the meeting are not allowed to vote on the subject matter

The Chair of the meeting must take a decision as to the need for the member of the meeting to withdraw or not from the proceedings. Where this may involve the Chair, the Deputy Chair will take the decision.

If the Chair of the meeting is the person to whom the declaration of interests relates, the Chair should vacate the seat and the meeting for that item. If there is no Deputy Chair present at the meeting, the meeting must first elect a Chair from within their number by a show of hands.

The written record of the decision should show, the nature of the conflict, which Trustees where affected, whether the conflicts were declared in advance, an outline of the discussion, whether anyone withdrew from the discussion , how the Trustees took the decision in the best interests of the organisation.

Dealing with a Declaration of interest

Trustees

In the case of a declaration of interests arising for a Trustee because of a duty of loyalty owed to another organisation or person and the conflict is not authorised by virtue of any other provision in the memorandum or the articles, the un-conflicted Trustees may authorise such a declaration of interests where the following conditions apply:

- The Charity Commission’s permission is sought before a benefit for a Trustee may be authorised that isn’t otherwise authorised in the Memorandum of Articles or already authorised in writing from the Commission.

- The Trustee who has declared the declaration of interest withdraws from the part of the meeting at which there is discussion of any arrangement or transaction affecting that other organisation or person;
- The Trustee who has the declaration of interest does not vote on any such matter and is not to be counted when considering whether a quorum of Trustees is present at the meeting;
- The other Trustees who have no declaration of interest in this matter consider it is in the interests of the charity to authorise the conflict of interest in the circumstances applying.
- Any such disclosure and the subsequent actions taken will be noted in the minutes.
- For all other potential declaration of interest the advice of the Charity Commission will be sought and the advice recorded in the minutes. All steps taken to follow the advice will be recorded.

All other Relevant Persons

In the case of a declaration of interests arising because of a duty of loyalty owed to another organisation or person, the un-conflicted Relevant Persons may authorise such a declaration of interests where the following conditions apply:

- The Board of Trustees' permission is sought before a benefit for a Director may be authorised
- The Chief Executive's permission is sought before a benefit for a Manager may be authorised.
- The Director/Manager who has declared the declaration of interest withdraws from the part of the meeting at which there is discussion of any arrangement or transaction affecting that other organisation or person.
- The other Directors/ Managers who have no declaration of interest in this matter consider it is in the interests of the charity to authorise the declaration of interest in the circumstances applying.
- Any such disclosure and the subsequent actions taken will be noted in the minutes.

Related Policies / Guidelines

Complaints Policy
Risk Management Policy
Statement of Purpose
Gift Acceptance and Anti-Bribery Policy
Treasury Management, Investment and Reserves Policy
Whistleblowing Policy

Monitoring and Review

This policy will be reviewed every three years or more frequently in response to legislation or Charity Commission Guidance

Statutory Compliance and Evidence referenced

Conflicts of interest: a guide for charity trustees (CC29)

Charity Commission 2022

Appendix 1 Trustee / Associate / Employee Declaration of Interest

Title: Forename: Surname:

Department: Other Capacity:

- ☐ I have read the Declaration of Interest Policy and I am filing this form in accordance with the policy.
- ☐ I do not have any declarations of interest with Tapping House, nor do any of my family members.
- ☐ I do have a declaration/family member have a declaration.

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This will be reviewed by the CEO and/or designee

- ☐ I am unsure if I or a family member may have a declaration of interest.

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This will be reviewed by the CEO and/or designee

Signature.. Date...

Appendix 2 Equality Impact Assessment				
Name of Document	**Declaration of Interest Policy**			
Date of assessment Dec 2025	**Date or review Dec 2028**			
Which area: Care/Finance/Retail	**financial**		**Senior Leadership Team Approval**	y
	Positive Impact	**Negative impact**	**No Impact**	**Comment**
Does the document affect one protected characteristic less or more favourably than another on the basis of:				
Race			**X**	
Gender including transgender			**X**	
Religion or belief			**X**	
Sexual orientation, to include heterosexual, lesbian, gay and bisexual people			**X**	
Age			**X**	
Marriage and Civil Partnership			**X**	
Pregnancy and Maternity			**X**	
Disability including learning disabilities, physical disabilities, sensory impairment and mental health issue's			**X**	
Does this document affect an individual's human rights? See list in EQA Guideline document				
Name which Human Right				
If there is potential discrimination, are the exceptions valid, legal and/or justified? If yes, what is the action e.g. Adjust the policy to remove disadvantage identified or better promote equality Continue the policy to demonstrate that such a disadvantage or advantage can be justified or is valid If neither of the above possible, submit to SLT for review				
Name of assessor	**N Ellis**		**Date**	**December 2025**