

Conflict of Interest (COI) Policy (Housing)

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| Policy Name: | Conflict of Interest (COI) Policy (Housing) |
| Version: | V.1 |
| Approved by: | The Board of Management and Trustees |
| Approved date: | 17th November 2025 |
| Next review date: | 17th November 2026 |
| Key Legislation and Regulations: | Charities Act 2011 Companies Act 2006 Trust Law and Fiduciary Duty Charity Commission Serious Incident Reporting Framework |
| Relevant Policies: | Risk Management Recruitment & Employment Whistleblowing Data Protection Staff Training EDI |
| EA: | Equality Analysis is currently under review |
| DPIA: | DPIA is currently under review |
| Consultation: | Board of Trustees |
| Applies to: | All Tenants, employees and volunteers |

1. Introduction

Oakfield (Easton Maudit) Ltd is built on a foundation of trust, transparency, and integrity. As a registered charity and social landlord, we are committed to ensuring that all decisions made by our Board of Trustees are taken solely in the best interests of the organisation and the people we support.

This policy sets out how Oakfield identifies, declares, and manages conflicts of interest, ensuring that trustees act with integrity and accountability, and that no individual benefits improperly from their position.

2. Purpose

The purpose of this policy is to:

- Safeguard Oakfield's decision-making processes from undue influence.
- Ensure trustees act solely in the interests of the Charity and its beneficiaries.
- Promote transparency and compliance with the Charities Act 2011 and Oakfield's governing document.
- Provide clear procedures for declaring and managing conflicts.

3. Scope

This policy applies to:

- All Trustees of Oakfield (Easton Maudit) Ltd
- Connected Persons (as defined below)
- Any individuals acting on behalf of the Charity in a governance capacity

4. Definitions

- Conflict of Interest: A situation where a Trustee's personal, financial, or professional interests, or those of a Connected Person—could influence, or be perceived to influence, their decisions or actions for the Charity.
- Connected Person: Includes a Trustee's spouse, partner, child, parent, close family member, business associate, or any person with whom the trustee has a close connection.
- Trustee Benefit: Any payment or financial advantage, direct or indirect, with monetary value. Examples include salaries, contracts, rent, gifts, hospitality, or interest on loans.

5. General Provisions on Benefits and Payments

Unless expressly permitted, no Trustee or Connected Person may:

- Purchase goods or services from the Charity on preferential terms.
- Sell goods, services, or land to the Charity.
- Be employed by or receive remuneration from the Charity.
- Receive any financial benefit unless authorised by the governing document or the Charity Commission.

Permitted Benefits Include:

- Receiving support as a beneficiary (if the majority of the board does not benefit).
- Payment for goods or services under sections 185-186 of the Charities Act 2011, with strict conditions.
- Interest on loans at or below Bank of England base rate.
- Rent for premises let to the Charity at a reasonable market rate.
- Participation in fundraising or trading activities on the same terms as the public.

Strict Controls Apply When Goods Are Provided Without Services:

- A written agreement must be in place.
- Payment must be reasonable and not exceed market value.
- The conflicted Trustee must withdraw from discussions and votes.
- The decision must be recorded in the minutes.
- A majority of Trustees must not be in receipt of any benefit.

6. Trustees' Responsibilities

All Trustees must:

- Complete a Declaration of Interests form on appointment and update it annually.
- Declare any actual or potential conflict at the start of relevant meetings.
- Withdraw from discussions and decisions where a conflict exists, unless permitted under the governing document.

- Act only in the best interests of Oakfield, not for personal gain or the benefit of others.

Failure to declare a conflict may be treated as misconduct and could result in disciplinary action.

7. Declaration of Interests

Trustees must declare any interest that could influence Oakfield's decisions or result in personal gain. This includes:

- Employment, consultancy, or business interests
- Membership of other organisations
- Property, investments, or financial interests
- Family or personal relationships that may give rise to conflict

Declarations are recorded in Oakfield's Register of Interests.

8. Register of Interests

Oakfield will maintain a Register of Interests that includes:

- All declared interests of Trustees and Connected Persons
- Details of any transactions where a conflict was managed
- Annual confirmations from Trustees

The register is reviewed annually and updated as new interests arise.

9. Conflict of Interest Procedures

Oakfield follows a five-step process to manage conflicts:

1. Identify - Trustees must identify and declare any actual or potential conflicts.
2. Declare - The conflict must be declared at the start of the relevant meeting.
3. Withdraw - The conflicted Trustee must withdraw from the discussion and vote, unless limited involvement is permitted under the Articles.
4. Record - The conflict, declaration, actions taken, and decision must be fully recorded in the minutes.
5. Decide - If there is uncertainty, the remaining Trustees will decide by majority whether a conflict exists.

Where a permitted benefit is involved, the conflicted Trustee may remain for part of the discussion only to inform the debate, but must not vote and will not be counted in the quorum.

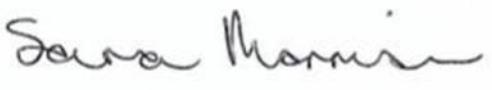
10. Communication and Training

This policy will be:

- Provided to all Trustees on appointment
- Included in the Trustee Handbook
- Reviewed during annual governance training
- Read alongside Oakfield's governing document and related policies (e.g. EDI, Safeguarding, Financial Controls)

11. Monitoring and Review

- The Chair of Trustees is responsible for ensuring this policy is followed during meetings.
- The Board maintains the Register of Interests.
- Breaches of this policy may result in disciplinary action, including removal from the Board
- This policy is reviewed annually or following significant incidents or legislative changes

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| Signed - Chair of Trustees: |  |
| Print: | Mrs Sara Morrison |
| Date: | 17 th November 2025 |