HvH ARTS
Conflict of Interest Policy

Policy owner	**Board of Trustees**
Approved by	Board of Trustees
Approval date	September 2026
Review date	April 2027

1. Purpose

HvH ARTS is committed to the highest standards of integrity, transparency and accountability. The purpose of this policy is to protect the integrity of the charity's decision-making processes, maintain the confidence of beneficiaries, funders, partners and other stakeholders, and protect the reputation and integrity of the charity and those who work with it.

This policy ensures that any actual, potential or perceived conflict between the interests of HvH ARTS and the personal, family, professional, financial or business interests of an individual is identified, declared and appropriately managed.

The policy applies to all Trustees, the Chief Executive Officer, staff, volunteers and any other person involved in significant decision-making on behalf of HvH ARTS.

2. What is a conflict of interest?
A conflict of interest arises where a person's personal, family, professional, financial or other interests could, or could reasonably be perceived to, influence their judgement or actions when carrying out their responsibilities for HvH ARTS.

A conflict does not necessarily imply wrongdoing. The important requirement is that any actual, potential or perceived conflict is declared promptly and managed openly and transparently.

Conflicts may include, but are not limited to:

- a financial interest in a decision, contract, supplier or transaction.
- a close personal or family relationship with a Trustee, member of staff, volunteer, contractor, applicant or supplier.
- decisions concerning the employment, remuneration, appraisal, contractual terms or benefits of a connected person.
- a Trustee, staff member or volunteer having an involvement with another organisation whose interests may overlap or compete with those of HvH ARTS, including competition for funding.
- outside employment, trusteeships, directorships or business interests that overlap with the work of HvH ARTS.
- an interest in, employment by, or relationship with a business that may be awarded a contract or provide goods or services to HvH ARTS.
- gifts, hospitality or other benefits that could influence, or reasonably appear to influence, decision-making.

Where an individual is unsure whether an interest constitutes a conflict, it should be declared so that appropriate advice and clarification can be sought.

3. Declaration and Register of Interests
On appointment, all Trustees and relevant senior staff will make a written declaration of any interests, relationships, positions, business interests or other circumstances that could potentially give rise to a conflict of interest.

HvH ARTS will maintain a Register of Interests, which will be reviewed at least annually and updated whenever an individual's circumstances change.

At the beginning of Board meetings, Trustees will be invited to declare any actual, potential or perceived interest relating to matters on the agenda, regardless of whether that interest is already recorded on the Register. Staff and volunteers are also expected to declare any conflict that arises in the course of their work or activities for HvH ARTS.

4. Managing conflicts

Where an actual, potential or perceived conflict arises, the Chair of Trustees, or another unconflicted Trustee where the Chair is conflicted, will determine the appropriate course of action.

Unless the unconflicted Trustees determine that a lesser measure is sufficient and legally appropriate, the conflicted individual will:

- declare the nature and extent of the interest before discussion begins.
- withdraw from the relevant discussion and not seek to influence the decision.
- leave the meeting for the relevant agenda item where appropriate.
- not vote on the matter.
- not be counted in the quorum for that decision where required by the charity's governing document or applicable law.

The declaration of the conflict, the individual's withdrawal or non-participation, and the decision reached by the remaining unconflicted Trustees will be recorded in the meeting minutes.

The remaining Trustees must consider the matter independently and be satisfied that any decision taken is in the best interests of HvH ARTS and its beneficiaries. Where there is uncertainty about the appropriate management of a significant conflict, Trustee benefit or related-party matter, HvH ARTS will seek appropriate independent advice and, where necessary, advice or authority from the Charity Commission. Any such advice and the actions taken in response will be appropriately recorded.

5. Connected persons and related-party matters

Any proposed payment, contract, employment arrangement or other financial benefit involving a Trustee or a person connected to a Trustee must be considered with particular care.

HvH ARTS will follow its governing document, applicable charity law and Charity Commission requirements concerning Trustee benefits, connected persons and related-party transactions.

No Trustee should use their position to secure a personal benefit for themselves, a family member, partner, business associate or other connected person.

Where required, independent advice and/or prior regulatory consent will be obtained before any arrangement is entered.

7. Trustee remuneration and expenses

Trustees do not receive remuneration for acting as Trustees of HvH ARTS. Reasonable and properly incurred expenses may be reimbursed in accordance with the charity's procedures. Any proposed payment or benefit to a Trustee, other than the reimbursement of legitimate expenses, must be authorised in accordance with the charity's governing document, applicable charity law and Charity Commission requirements.
Any Trustee affected by such a proposal must take no part in the relevant discussion or decision.

8. Gifts and hospitality

Trustees, staff and volunteers must not accept gifts, hospitality or other benefits that could reasonably be considered to influence, or appear to influence, their judgement or decision-making on behalf of HvH ARTS.
Any significant offer of a gift, hospitality or benefit connected with HvH ARTS business should be declared to the Chair of Trustees or CEO and recorded where appropriate.

9. Breaches of this policy

Failure to declare or appropriately manage a conflict of interest may undermine confidence in the charity and its governance. Where a potential breach is identified, the matter will be reviewed by the unconflicted Trustees. Appropriate action will be taken in accordance with HvH ARTS'

governing document, organisational policies and legal and regulatory responsibilities. Where necessary, independent professional advice or guidance from the Charity Commission will be sought.

10. Monitoring and review

The Board of Trustees is responsible for overseeing and monitoring the implementation of this policy. The Register of Interests will be reviewed at least annually and updated whenever circumstances change.
This policy will be reviewed annually, or sooner if there is a significant change in the charity's governance, relevant legislation or Charity Commission guidance. This policy is intended to support good judgement and responsible governance. Trustees, staff and volunteers are expected to respect both its wording and its spirit and, where in doubt, to declare a potential conflict rather than leave it undisclosed.

11. Approval

This policy has been approved by the Board of Trustees of HvH ARTS and applies to all Trustees and relevant staff and volunteers from the date of approval.

This policy is meant to supplement good judgment, and staff, volunteers and Directors should respect its spirit as well as its wording.