

CONFLICT OF INTEREST POLICY

Purpose

The purpose of this policy is to help board members of the Culture, Heritage and Arts Assembly, Argyll and Isles (CHARTS), to effectively identify, disclose and manage any actual, potential or perceived conflicts of interest in order to protect the integrity of CHARTS and manage risk. It should also be seen as applying to all staff, including freelancers.

Objective

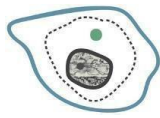
The CHARTS board aims to ensure that board members are aware of their obligation to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of CHARTS. The Executive Director will ensure that all staff, including freelancers, are also aware of their obligations.

Scope

This policy applies to the board members of CHARTS, and has specific relevance to board appointments and undertaking of Office Bearing roles.

This policy also applies to staff, whether employed or freelance, and is to be considered as part of recruitment processes.

This policy will be referenced in all staff contracts (employees and commissioned staff).



Definition of Conflicts of Interests

A conflict of interest occurs when personal interests might incline a Board member or member of staff to a course of action incompatible with their responsibility to act in the best interests of CHARTS. A conflict of interest, including of loyalty, may be actual, potential or perceived and may be financial or non-financial.

Personal interests include direct interests (such as obligations arising out of a contract of employment), as well as those of family, friends, or other organisations a person may be involved with or have an interest in (e.g. as a stakeholder).

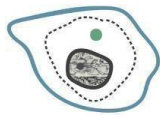
They also include conflicts between a board member or member of staff's duty to CHARTS and another duty that the board member or member of staff has (for example, to another charity). A conflict of interest, including of loyalty, may be actual, potential or perceived and may be financial or non-financial.

These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of CHARTS.

Therefore, these situations must be managed to ensure that the interests of CHARTS remain paramount.

Policy

It is the policy of CHARTS that ethical, legal, financial or other conflicts of interest should be avoided and that any such conflicts that do arise are managed so that they do not conflict with obligations to CHARTS. Conflicts of interest are common, and they do not need to present a problem to CHARTS as long as they are openly and effectively managed.



CHARTS will manage conflicts of interest by requiring board members and staff to:

- Avoid conflicts of interest where possible.
- Identify and disclose any conflicts of interest.
- Carefully manage any conflicts of interest.
- Follow this policy and respond to any breaches.

Responsibilities of the Board

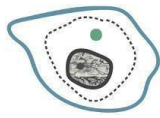
The board is responsible for:

- Agreeing a system for identifying, disclosing and managing conflicts of interest across CHARTS.
- Monitoring compliance with this policy.
- Reviewing this policy on an annual basis to ensure that the policy is operating effectively.

Identification and Disclosure of Conflicts of Interest

On appointment and then annually, board members and staff must supply CHARTS with a list of any organisations in which they or a close family member are (or, in the previous 12 months, have been) a director, trustee, material shareholder, or member of staff and which may look to benefit from CHARTS or which is related to a cultural agency in Scotland/UK. They should err firmly on the side of openness and transparency here and ask if they have any concern at all that a connection they have falls into the category of interests that should be declared.

The register of interests for board members will be maintained by the Secretary and will be available to the Executive Director. The register must record information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it). The register of interests for staff will be maintained by the Executive Director.



Action Required to Manage Conflicts of Interest

In addition to registering an interest formally as set out above, board members and staff must declare an interest orally at the beginning of a meeting or informal discussion where any aspect of the affairs of an organisation in which they have an interest appears on the agenda. If the affairs of an organisation do not appear on the agenda but arise during the course of a discussion, they must draw attention to the interest without delay.

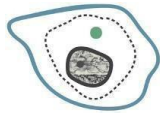
Once they have declared an interest, they must withdraw from the meeting or discussion at the appropriate point. If they are not sure whether they have an interest to declare and need to withdraw, they must raise the matter with the person leading the meeting. If they are leading the meeting or discussion, they must withdraw for the duration of the item in question after nominating another person present to lead the discussion or meeting in their absence.

The minutes of any meeting or note of any discussion must record the declaration of interest and indicate clearly the points at which the board member or member of staff withdrew from and re-joined the meeting or discussion.

In exceptional circumstances, such as where a conflict is very significant or likely to prevent a board member from regularly participating in discussions, it may be worth the board considering if it is appropriate for the person conflicted to resign from the board.

Confidentiality of Disclosures

The Secretary will have confidential access to all information disclosed by board members. The Executive Director will have access to information only where a conflict of interest has the capacity to impact on the development and reputation of the organisation. If staff are to be notified, this will be discussed with the board members concerned prior to information being shared.



A summary of the register for board members, identifying key conflicts of interest, will be made publicly available on CHARTS' website.

At each AGM, the register of conflicts of interest and how these are handled by the board will be available to members on request.

Compliance with this Policy

If the board has a reason to believe that a person subject to the policy has failed to comply with it, it will investigate the circumstances.

If it is found that this person has failed to disclose a conflict of interest, the board may take action against them. This may include seeking to terminate their relationship with CHARTS.

If a person suspects that a board member has failed to disclose a conflict of interest, they must notify the Chair of the Board, responsible for assuring good governance.

Document Version Control

Any questions, contact info@chartsargyllandisles.org

Reviewed 8 November 2025