



Lotus Flower Trust

UK Charity No 1127316

CONFLICTS OF INTEREST POLICY

This policy applies to all Trustees, the Chief Executive (“CEO”) and all senior staff

Why have a policy?

Each Trustee, the CEO and all senior staff have an obligation to act in the best interests of Lotus Flower Trust (“LFT”), and in accordance with LFT’s governing documents. Conflicts of interests may arise where an individual’s personal or family interests and/or loyalties conflict with those of LFT.

Such conflicts may create problems. They can:

- inhibit free discussion;
- result in decisions or actions that are not in the interests of LFT; and
- risk the impression that LFT has acted improperly.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

The declaration of interests

Accordingly, all Trustees, the CEO and all senior staff are obliged to declare their interests, and any gifts, or hospitality, received in connection with their role in LFT.

If any of the Trustees, CEO, or senior staff are not sure what to declare, they are asked to err on the side of caution. If they would like to discuss this issue, they should contact the person from time to time appointed to handle governance for LFT, who will give confidential guidance. Interests will be recorded on LFT’s register of interests.

Data Protection

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only

to ensure that the Trustees, the CEO and senior staff act in the best interests of LFT. The information provided will not be used for any other purpose.

What to do if you face a conflict of interest

If any of the Trustees, CEO or senior staff face a conflict for any reason such person should not be involved in decisions that directly affect the person or subject matter of the conflict. They should declare their interest at the earliest opportunity and withdraw from any subsequent discussion. They may, however, participate in discussions from which they may indirectly benefit, for example where the benefits are universal to all users, or where the benefit is minimal.

If any person fails to declare an interest that is known to any of the Trustees or the CEO that person will declare that interest.

Decisions taken where a Trustee, the CEO or senior member of staff has an interest

In the event of the Trustees having to decide upon a question in which a Trustee, the CEO or senior member of staff has an interest, all decisions will be made by vote, with a simple majority required. A quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate.

Interested Trustees may not vote on matters affecting their own interests. They may participate in the discussion but not the decision-making process.


All decisions under a conflict of interest will be reported in the minutes of the meeting. The report will record:

- The nature and extent of the conflict;
- An outline of the discussion;
- The actions taken to manage the conflict.

Managing contracts

If a Trustee, CEO or senior staff has a conflict of interest, they must not solely be involved in managing or monitoring a contract in which they have an interest, unless such interest is minimal. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.

Approved by the Trustees on 31 March 2017

..... Chairman