



Conflict of Interest Policy

Version: 2025.1

Review Date: July 2026

Approved By: Board

Applies To: Tenants, Staff and all houses managed by Aves Housing

Policy Owner: Governance Lead / Company Secretary

1. Introduction

Aves Housing is committed to maintaining the highest standards of integrity, transparency, and accountability in all its operations. This policy sets out the framework for identifying, declaring, and managing conflicts of interest across the organisation.

2. Policy Objectives

- Prevent actual, potential, or perceived conflicts from influencing decisions
- Ensure compliance with legal, regulatory, and ethical standards
- Protect the reputation and operational integrity of Aves Housing
- Promote a culture of openness and accountability

3. Scope

This policy applies to: Board members, Employees, Volunteers and contractors, Tenant Panel members involved in decision-making, and any individual acting on behalf of Aves Housing

4. Definitions

A conflict of interest occurs when an individual's personal, professional, or financial interests could improperly influence—or appear to influence—their duties or decisions within Aves Housing.

Types of conflict include:

Type	Example
Financial	Holding shares in a supplier company
Personal	Family member applying for tenancy

Type	Example
Professional	Secondary employment with a care provider
Organisational	Serving on a board with overlapping interests

5. Declaration of Interests

- All relevant individuals must complete a **Declaration of Interests Form** on appointment and annually thereafter
- Declarations must be updated immediately if circumstances change
- A Register of Interests will be maintained by the Governance Lead and reviewed annually by the Board

6. Identification and Management

When a conflict is identified:

- It must be declared to the relevant line manager or Governance Lead
- The individual may be excluded from related discussions or decisions
- Mitigation measures will be agreed and documented
- Serious or unresolved conflicts will be escalated to the Board or Audit Committee

7. Governance Oversight

- The Board will annually review the Register of Interests
- Conflicts affecting board-level decisions will be minuted and disclosed
- The Audit Committee will monitor compliance and recommend improvements

8. Training and Awareness

- All staff and board members will receive training on this policy during induction
- Refresher training will be provided every two years
- Tenant Panel members will be briefed on impartiality and disclosure expectations

9. Breaches and Non-Compliance

Failure to declare or manage a conflict may result in:

- Disciplinary action
- Termination of contract or appointment
- Referral to external regulators or authorities

DECLARATION OF INTERESTS AND CONFLICTS OF INTEREST

I declare that I _____ [do / **do not**] have any conflicts of interest or loyalty regarding any of the activities currently being undertaken or proposed to be undertaken by Aves Housing Association. In particular, I know of no:

- direct financial gain or benefit to myself, such as:
- payment to a trustee for services provided to the organisation
- the award of a contract to another organisation in which a trustee has an interest and from which a trustee will receive a financial benefit
- the employment of a trustee in a separate post within the organisation even when the trustee has resigned in order to take up the employment
- indirect financial gain, such as employment by the organisation of a spouse or partner of a trustee, where their finances are interdependent
- non-financial gain, such as when a user of the organisation's services is also a trustee
- conflict of loyalties, such as where a trustee is appointed by the local authority or by one of the organisation's funders, or where a friend of a trustee is employed by the organisation

except as follows:

(please state any exceptions)

I also declare that:

I am carrying out my duties as trustee in the best interests of the organisation and will continue to do so.

I am not a director of or do not own any other companies. (If yes, please provide details.)

I am not a member of any other relevant organisations, e.g. Director or trustee of another organisation, working or volunteering for another related organisation or professional association. (If yes, please provide details.)

I have not received any gifts or hospitality (estimated value exceeding £25) as part of my work for Aves Housing Association during the year ended 31st March 2024 (excluding reimbursed expenses).

I do not have a spouse, partner or immediate family member who may benefit from my work as a Director. (If yes, please provide details.)

I have read the guidance notes issued by the Charities Commission in regard to conflicts of interest and fully understand them when signing this statement.

If for any reason my circumstances change so that I am placed in the position of a conflict of interest I will advise the Chair or another trustee who will report it to the next Board meeting.

.....
Director's signature

.....
Director's name

.....
Date