



---

## Mevagh Family Resource Centre Conflict of Interest and Loyalty Policy

---

<b>Document:</b>	Conflict of Interest and Loyalty Policy
<b>What is this?</b>	This is Mevagh Family Resource Centre's (Mevagh FRC) current Conflict of Interest and Loyalty Policy
<b>CRA Code Sections:</b>	2.2
<b>Use of Document</b>	Directors of the Mevagh FRC CRA Compliance
<b>Date Policy Approved:</b>	This Policy was approved by the Voluntary Board of Directors of the Mevagh FRC at its meeting on 18.11.24
<b>Review Date:</b>	This Policy will be reviewed every 3 years by the Voluntary Board of Directors of Mevagh FRC.

## **Conflict of Interest and Loyalty Policy**

The purpose of this policy is to assist the Directors of Mevagh FRC to effectively identify, record and manage any conflicts of interest in order to protect the integrity of our decision-making processes and to ensure that the Directors act in the best interest of Mevagh FRC.

### **Objective**

Mevagh FRC aims to ensure that the Directors are aware of their obligations 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 Mevagh FRC.

### **Scope**

This policy applies to the Directors of Mevagh FRC.

### **Definition of a Conflict of Interest**

A conflict of interest is any situation in which a Directors personal interests or loyalties could, or could be seen to, prevent the Director from making a decision in the best interests of Mevagh FRC. This personal interest may be direct or indirect and can include interests of a person connected to the Director. 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 Mevagh FRC and therefore must be managed accordingly.

### **Policy**

This policy has been developed because conflicts of interest commonly arise, and do not need to present a problem if they are openly and effectively managed. It is the policy of Mevagh FRC as well as a responsibility of its Directors, that ethical, legal, financial, or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with their obligations to Mevagh FRC.

Mevagh FRC will manage conflicts of interest by requiring Directors to:

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

### **Responsibility of the Board of Directors of Mevagh FRC**

The Board of Mevagh FRC is responsible for:

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

Mevagh FRC Directors should ensure they are aware of their legal obligations in the management and control of Mevagh FRC and should refer to the Charities Regulator's 'Guidance for Directors' for further information on this (see the Charities Regulator website [www.charitiesregulator.ie](http://www.charitiesregulator.ie))

## **Disclosure & Confidentiality**

### **Written Disclosure**

All Board Directors shall make a full written *Declaration of Interest* (**Appendix 1**) upon appointment to Mevagh FRC. This written disclosure will then be entered into Mevagh FRC *Register of Interests* (**Appendix 2**). The *Register of Interests* will be maintained in the office of Mevagh FRC and is updated annually or more frequently as appropriate should any changes come into effect that would render the previous version to be invalid.

All disclosures will be kept in line with Mevagh FRC Data Protection Policy, however, any Directors benefits must be disclosed in Mevagh FRC Accounts. The Charities Statement of Recommended Practice (SORP) (FRS 102) requires the disclosure in the Directors' Report of most transactions with related parties to provide transparency to users of the Directors' annual report and accounts and so that they can assess whether the relationship between the charity and the other party or parties to a transaction may have been influenced by interests other than those of the charity. Disclosing related party transactions also shows how far, if at all, the reported financial position and activities may have been affected by such transactions.

### **Standing Item on Board Agenda**

A standing item in all Board meetings shall be conflict of interest declaration prior to, or upon commencement of meetings or discussion of activities. Board Directors will disclose any interests in a transaction or decision where there may be a conflict between Mevagh FRC best interests and the Board Director best interests, or a conflict between the best interests of two organisations that the Board Directors are involved with.

If the Board Director is uncertain whether the conflict concerns a personal interest, he/ she/they should seek the guidance of the Chair/ Manager.

### **Obligation to Dissociate from Affected Discussions**

The assumption is that a Board Director will absent himself/herself/themselves from a meeting while a matter on which he/she/they has declared a personal interest is being discussed. However, the Board of Directors may decide that the conflict is not of sufficient substance to demand the Directors absence. But the Director may not take part in the discussion nor vote on the matter. The Minutes shall record any declared conflict of interest and whether the Director concerned was present during discussion on the item.

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

### **Obligation to Report**

Where a Board Director of Mevagh FRC becomes aware of any person who has not declared a conflict of interest between the interests of Mevagh FRC (or any of its subsidiaries) on one hand, and personal, professional, and business interests on the other, such a conflict or potential conflict must be reported to the Chair of the Board.

### **Compliance with this Policy**

Where the Board of Directors has a reason to believe that a person subject to this 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 of Directors may take action against the person. This may include seeking the person's resignation from Mevagh FRC.

**Signed:** \_\_\_\_\_

**Name:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Review**

This policy will be reviewed in 3 years or sooner should circumstances change.

**Review**

This policy will be reviewed in 3 years, or sooner should circumstances change.

Signed: Lo Byre (Chairperson)

Date: 18 / 11 / 24

Signed: [Signature] (Director)

Date: 18 / 11 / 24

**Revision History**

Revision No.	Approval Date	Document Reference and Changes Made	Name

## Appendix 1 Mevagh FRC Declaration of Interest

<b>Category</b>	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family, connected persons or some other close personal connection.
Current employment and any previous employment in which you continue to have a financial interest.	
Appointments (voluntary or otherwise) e.g., directorships, local authority membership, etc.	
Membership of any professional bodies, special interest groups or mutual support organisations.	
Investments in unlisted companies, partnerships and other forms of business, major shareholdings (more than 1% of issued capital) and beneficial interests.	
Gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last twelve months.	
Any contractual relationship with Mevagh FRC.	
Any other interest which is not covered by the above.	

To the best of my knowledge, the above information is complete and correct. I undertake to update, as necessary, the information provided and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

**Signed:**

---

**Position:**

---

**Date:**

---

**Appendix 2: Template of Register of Interests**

**Mevagh FRC - Register of Interests**

Name of FRC Director	Date of Appointment	Description of Interest	Has FRC been notified of the Interest?	Date of Disclosure

Signed: \_\_\_\_\_ Date: \_\_\_\_\_