

Parish Conflict of Interest Policy

Version Control

Version	Date	Revision Author	Summary of Changes
V1	11/03/2021	V. Leatham	First edition

Contents

1. Introduction	1
2. Purpose	1
3. Scope and Responsibility	2
4. Definition of conflicts of interests	2
5. Policy	2
6. Identification and Disclosure	3
7. Action Required	3
8. Compliance with this policy	4

1. Introduction

The Parish Priest, or his equivalent in law, makes the governing decisions within the Parish. In line with good governance practices, a Parish Priest should declare any conflict of interest and ensure any conflict is managed appropriately. Members of councils or committees of the Parish should also declare any conflict of interest and follow the procedure set out in this policy.

The fundamental principle is that an individual should not use, or give the appearance of using, their position within the Parish to further their private interests.

A conflict of interest is defined in section 4 below.

2. Purpose

The purpose of this policy is to assist the Parish Priest to effectively identify, record and manage any conflict of interest in order to protect the integrity of the Parish.

This policy applies to any conflict of interest which the Parish Priest may have in his role as Pastor of the Parish.

This policy also applies to any member of a Parish Committee who have influence on governing decisions of the Parish.

3. Scope and Responsibility

The Parish Priest is accountable for ensuring the implementation of this policy. Members of committees and councils, who play an influencing role in the process of decision making on governing matters, should also declare conflicts of interest. The Parish Priest and chairperson of each meeting should then ensure any conflict declared is managed appropriately. The Vicar Forane may also support the Parish Priest where applicable.

The provisions of this Conflict of Interest Policy sit alongside any relevant provisions of Canon Law, to which the Parish Priest must always ensure adherence on his part.

4. Definition of conflicts of interests

A conflict of interest is any situation in which an individual's personal interests or loyalties could, or could be seen to, prevent the individual from making a decision in the best interests of the Parish. This personal interest may be direct or indirect, and can include interests of a person connected to the individual.

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 the Parish, and therefore must be managed accordingly.

5. Policy

5.1 This policy has been developed because conflicts of interest commonly arise, and do not need to present a problem to the Parish if they are openly and effectively managed. It is the policy of the Trust, as well as a responsibility of its trustees, 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 the Parish.

5.2 The Parish Priest will manage conflicts of interest by requiring himself and members of council or committees of the Parish 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.

5.3 A Parish Priest or member of Council or committees of the Parish:

- must not put himself in a position where his personal interests and duties as a fiduciary may conflict;
- must not appropriate for himself or by way of diversion to another entity associated with him, any opportunities that the Parish is actively pursuing.

5.4 A Parish Priest or member of council or committees of the Parish must be aware of circumstances where conflicts of interests can occur:

- failing to disclose interests or potential interests in contracts involving the Parish; or
- giving advice in relation to a contract or potential contract which involves someone connected to him/her.

5.5 The Parish Priest is responsible for:

- establishing a system for identifying, disclosing and managing conflicts of interest within the Parish;
- monitoring compliance with this policy

6. Identification and Disclosure

Once an actual, potential or perceived conflict of interest is identified, it must be entered into the Parish Register of Interests (see appendix 1.) and declared at relevant council or committee meetings where the conflict applies. The Parish Register of Interests must be maintained and all information related to a conflict of interest recorded (including the nature and extent of the conflict of interest and any steps taken to address it). Meeting agendas should always include an opportunity for conflicts of interest to be declared. Meeting minutes should also note if a conflict of interest has arisen and how it has been managed within the meeting.

The Parish Register of Interest should be kept by the Parish Priest and available for the Finance Committee Chairperson to review.

7. Action Required

7.1 In deciding what approach to take when a conflict of interest arises, it should be considered:

- whether the conflict needs to be avoided or simply documented

- whether the conflict will realistically impair the disclosing person's capacity to impartially participate in offering advice or decision making
- if there are alternative options to avoid the conflict
- if there is a possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of, the Parish

Once the above has been duly considered, it should be determined if further action is required. Where required, the conflicted individual may not be present for the discussion or final decision relating to the conflict.

Illustrative Example:

The roof of the Parish church requires repair. A member of the Parish Finance Committee makes a recommendation at a committee meeting for someone to fix the roof. He engages his brother's roofing firm. The roof is repaired and paid for.

This is conflict of interest for the member. He should have made an entry in the Parish Register of Interests and i) disclosed his interest at the meeting ii) identified his connection and iii) stepped out of discussions and/or voting around the choice of contractor. A good suggestion would be for the Parish to obtain 3 quotes for the repair work, so that the Parish obtains value for money. Details of how the conflict was disclosed and dealt with should have been recorded in the minutes of the meeting.

7.2 If a Parish Priest has a conflict of interest, he should consult with the Vicar Forane when making a decision related to the conflict. To ensure accountability and transparency, details of this consultation should be documented on the Parish Conflict of Interests Register.

8. Compliance with this policy

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

If it is found that a person has failed to disclose a conflict of interest, the Parish may take action against the person. This may include seeking the person's resignation from the position on council or committee of the Parish.

If a person suspects that a member of council or committee of the Parish has failed to disclose a conflict of interest, they must bring this to the attention of the Parish Priest.

If a person suspects that a Parish Priest has failed to disclose a conflict of interest, they must bring this to the attention of the Vicar Forane or Moderator of the Curia.

Appendix 1. Parish Register of Interests Sample Template

Parish Register of Interests

(Personal data added to the register should be kept to a minimum where feasible and stored in line with GDPR.)

Name and role of Individual	Conflict of Interest	Action Taken	Date Declared

(Personal data added to the register should be kept to a minimum where feasible and stored in line with GDPR.)

Review Date	Signed (Parish Priest)