

NEXT STEP HOMES LIMITED

POLICY ON CONFLICTS OF INTEREST

1. Aims

Next Step Homes Limited is committed to ensuring that its governance is open and accountable and is conducted in accordance with the highest ethical standards. In this context, it is recognised that from time to time, the Association, its staff or governing body or the staff of its managing agents will require to take a decision or decisions in which members of its governing body or staff will from time to time have an interest which is not identical to the interests of the Association. The purpose of this policy is to set a framework within which such interests may be recorded and within which such conflicts may be properly governed and resolved.

2. Objectives

The Association would expect that conflicts of interest will arise from time to time. It is a natural and healthy thing to arise when the Association seeks to involve, for example, tenants and other stakeholders in its activities. While it is the primary responsibility of the person affected to recognise and to declare an interest which may be in conflict with the interests of the Association, this policy will set up a framework within which relevant persons will be aware of the need to consider the declaration of relevant interests.

This policy will also set in place arrangements for recording and monitoring declarations of interest.

3. Definitions

“Relevant persons” in this policy refer to current members of the Committee of Management of Next Step Homes Limited, together with any co-opted members of its sub-committees or working parties, any member of staff employed under a contract of employment by the Association or employed by the Association’s managing agent and any person, company, firm or partnership employed to provide professional services to the Association which services include the provision of advice to and attendance at meetings of the governing body, sub-committees or working parties as aforesaid.

“Relevant interests” need not be financial interests. Clearly, if a person has something to lose or gain financially from a decision taken by the Association, then it is only right that that person should make his or her interest known to the Association. There are however non-financial interests which equally require to be taken into consideration. These might involve circumstances where the matter under discussion may involve the interests of the employer or a member of Committee or an organisation of which the person is a member or office bearer. It should also be understood that any matter which involves a close relative of the relevant person should be treated in the same way as if it involved the person directly.

The decision on whether or not to declare an interest is a matter for the person concerned. He or she should take that decision bearing in mind the test of whether a third party, acting reasonably, could think that a person's judgement might be influenced by a possible conflict of interest. If there is any doubt, then an interest should be declared and recorded.

4. Register of Interests

The Association maintains and annually updates a register of interests of its governing body, its senior staff and the senior staff of its managing agents. The register records business interests, directorships and involvements in public and commercial bodies and any landholdings other than the person's own private residence. A copy of the standard entry in the register is appended to this policy.

5. Procedure at Meetings of the Governing Body, its Sub-Committees and Working Parties etc

Each notice sent out calling meetings of the governing body, its committees, sub-committees and other working parties will state in a prominent position the requirement for those participating to consider whether or not they have declared interests. The responsibility for declaring that interest however will rest with the individuals concerned. Any interest to be declared should be intimated to the Chairman either at the start of the meeting or prior to the discussion on the relevant item.

Once an interest is declared, it is a matter for the Chairman of the meeting to decide whether or not the person can remain during the discussion of the item. It is reasonable to take the view that for example a tenant who is a member of the governing body will have an interest in the fixing of rent levels and that interest should be declared and recorded. Nonetheless, it might be regarded as unreasonable to exclude all tenant members from discussion of such a major item. On the other hand, the interest might be so clear and direct that it would be improper for any discussion to take place with the relevant person present. In those circumstances, the Chairman could reasonably request that the person who had intimated an interest should withdraw.

6. Monitoring and Review

The register of interests is held by the Chief Executive of the managing agents in his role as Company Secretary and is open for inspection at any reasonable time. In addition, the Chief Executive will report annually on the number and nature of interests declared at meetings of the governing body, its committees or sub-committees.

This policy document will be reviewed every 2 years.

Date Approved by Committee of Management: 02.07.08

Review Period: 2 Years

Date Due for Review by Committee of Management: July 2010