

Appendix 3: Conflict of interest assessment

Foreshore Trust Large Grant Programme - Conflicts of Interest

Conflict	Risk	Mitigation
That the council is the Sole Trustee of the Foreshore Trust Charity.	That by the council managing the Foreshore Trust business could influence the proposed grant programme.	<ol style="list-style-type: none"> 1. The Charity Committee made a decision at its meeting on 10th December 2018 to fund the proposed themes based on gaps and needs identified in Hastings and St Leonards. Source Foreshore Trust Business Plan 2019 – 2022 dated 10th December 18 – Item 13 https://hastings.moderngov.co.uk/ieListDocuments.aspx?CId=172&MId=3098&Ver=4 2. Charity committee members are given training every year on conflict of interest. The charity has a conflict of interest policy and a Protector. 3. All decisions about every aspect of the proposed programme have been made by the Charity Committee members and the GAP as per the Charity Grant Scheme, with a small select number of designated council staff acting in administrative and supporting roles only. 4. The Protector has been fully involved in every stage of the design of this programme.
The Foreshore Trust Large Grant Programme is very similar to the Community Partnership Fund (CPF).	That the council would benefit from the Foreshore Trust programme as it funds similar priorities to those of the CPF.	<ol style="list-style-type: none"> 1. CPF was not a statutory function or activity of the council 2. Council budgets have been shrinking over the last few years and the council has withdrawn or reduced commitment to a number of activities in the town. The council advised in the 18/19 budget that it would no longer be able to fund this non-statutory function of supporting the activities of the local community and voluntary sector from April 2021. 3. The Charity Committee took the decision in March 2019 to commit itself to funding additional charitable causes. 4. The Charity Committee made a decision to fund the proposed themes based on local needs identified by public consultation (July 2016). 5. The charitable organisations that provide the services associated with the CPF themes were not totally reliant on the CPF grant to fund them. They are funded from a wide variety of sources and will continue to be so.
	That some statutory functions of the council will benefit from the proposed programme.	<ol style="list-style-type: none"> 1. The successful applicants' support will be covering different services to those provided by the council – they will be supporting the same client group but not in the same way. 2. The Charity Committee made a decision to fund the proposed themes based on gaps and needs identified in Hastings and St Leonards. Source Foreshore Trust Business Plan 2019 – 2022 dated 10th December 18 – Item 13 https://hastings.moderngov.co.uk/ieListDocuments.aspx?CId=172&MId=3098&Ver=4

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		<ol style="list-style-type: none"> 3. Colleagues from the teams supporting statutory functions of the council were not consulted about the specifics of each proposed theme and have not been involved in the development of the Foreshore Trust large grants programme. 4. HBC does have statutory responsibilities for homelessness for example, and whilst any funding given to support agencies may help the same client group the support will be fundamentally different.
Eligibility of applicants	That council officers will be able to influence which applicants' bids will be seen by the GAP.	<ol style="list-style-type: none"> 1. Initial eligibility checks will be carried out by the Compliance Monitoring Officer against a set of criteria agreed by the Foreshore Trust. 2. Any applications that are ineligible, and the reasons why, will be set out and considered by the Grant Advisory Panel. 3. The GAP will make the decision on which applications will be recommended for approval to the Charity Committee.
Conflict of interest of GAP members	Conflicts of interest for GAP members could result in biased decision making.	<ol style="list-style-type: none"> 1. GAP members are asked to declare conflicts of interest for all the applicants as soon as the programme closes and then take no further part in the assessment process. 2. GAP members who have declared conflicts of interest are asked to leave the panel meetings whilst the discussions for the relevant applicant take place. 3. There are written records of the GAP members' declared conflicts of interest at all stages from the receipt of applications through to the assessment and recommendation processes.
	GAP members request further advice or have questions about the applications.	Only a small select number of designated council staff are responsible for the administration of the programme and would act as a conduit between the applicants and the GAP. The panel has the power to interview the applicants (if necessary) but all applicants would need to be interviewed to be fair.
Conflict of interest of Charity Committee members	Charity Committee members may have potential conflicts of interest, which could result in biased decision making.	If Charity Committee members have potential conflicts of interest they would not be permitted to sit on the Charity committee. Members of the Charity Committee must be Cabinet members so a substitution from Cabinet would be selected to sit. If in the unlikely event that everybody had conflicts of interest the Monitoring Officer would consider issuing a dispensation to members.