



Liverpool Archdiocesan
Lourdes Pilgrimage
Association

Conflicts of Interest Policy

Name of originator/author:	Policy Review Group & Pilgrimage Executive
Date issued:	June 2026
Date Reviewed:	
Date next review due:	June 2027

Purpose

The purpose of this policy is to protect the integrity of the decision-making of the Liverpool Archdiocesan Lourdes Pilgrimage Association (“the Association”), to enable stakeholders to have confidence in our governance, and to ensure that trustees, officers, clergy, volunteers and staff act in the best interests of the Association.

This policy supports compliance with Charity Commission guidance and the legal duties of charity trustees.

Scope

This policy applies to:

- All trustees of the Association
- Committee members
- Clergy involved in the Association’s governance
- Staff and volunteers in decision-making roles

Definition of a Conflict of Interest

A conflict of interest occurs when an individual’s personal interests, or interests they owe to another organisation or person, **could influence or appear to influence** the decisions they make on behalf of the Association.

Conflicts may be:

- **Financial** (e.g. benefiting from contracts or payments)
- **Non-financial** (e.g. reputation, influence, relationships)
- **Direct or indirect**

Examples of Conflicts Relevant to LAPA

Examples include (but are not limited to):

- A trustee or volunteer has a financial interest in a **travel company, hotel, or supplier** used for pilgrimages
- A trustee is involved in selecting a supplier where a **family member or close associate** is involved
- Clergy or leaders influencing decisions that affect **parish groups or affiliated organisations**
- Acceptance of **gifts, hospitality, or incentives** from suppliers
- Dual roles within other charities or diocesan bodies with overlapping interests

Duty to Act

All individuals covered by this policy must:

- Act solely in the best interests of the Association
- Avoid placing themselves in situations where conflicts may arise
- Declare any conflicts promptly and fully
- Comply with decisions made to manage conflicts

Identifying Conflicts

Conflicts must be declared:

- On appointment (via a declaration of interests form)
- Annually (through an updated register of interests)
- At the start of any meeting where relevant matters arise
- As soon as a new conflict becomes apparent

Register of Interests

The Association will maintain a **Register of Interests**, which records:

- Financial interests
- Relevant employment or roles
- Business and family connections
- Other charity or diocesan roles

The register will be:

- Reviewed annually
- Available to trustees and, where appropriate, regulators

Managing Conflicts

When a conflict is identified:

1. The individual must **declare the interest** clearly
2. The Chair (or meeting lead) will decide how the conflict is managed
3. The individual will normally:

- Withdraw from discussion
- Not vote on the matter
- Leave the meeting if necessary

All decisions will be:

- Clearly recorded in the minutes
- Transparent and justifiable

Serious Conflicts

Where a conflict is significant or ongoing, the Association may:

- Restrict the individual's involvement in related activities
- Require resignation from a specific role
- Seek advice from the Archdiocese or the Charity Commission

Loyalty Conflicts

Trustees may have loyalties to:

- The Archdiocese of Liverpool
- Parishes or other Catholic organisations
- Other charities

Such loyalties must not override the duty to act in the best interests of the Association.

Gifts and Hospitality

Trustees, staff, and volunteers must:

- Not accept gifts or hospitality that could influence decisions
- Declare any significant offers (financial or non-financial)
- Follow any additional diocesan guidance where applicable

Breaches of Policy

Failure to comply with this policy may result in:

- Removal from decision-making processes
- Disciplinary action (where applicable)
- Removal from trustee or volunteer roles

Serious breaches may be reported to the Charity Commission where required.

Review of Policy

This policy will be:

- Reviewed annually
- Updated as necessary to reflect changes in law, Charity Commission guidance, and the activities of the Association