CONFLICT OF INTERESTS POLICY

HAMA is committed to managing our debt advice service ethically, efficiently and with the primary intention of delivering a good quality service whilst avoiding any confusion of roles. Therefore HAMA will expect anyone who works for HAMA in whatever capacity to be committed to meet these standards.

HAMA expects all prospective and current voluntary or employed workers, e.g. trustees, advisers, befrienders, administrators - collectively "personnel" - to declare any interests to the trustees or the Centre Manager that may conflict with this principle. In particular advisers must declare any possible conflict of interests that could adversely affect clients seeking advice. (See list below for some examples)

It is the policy of HAMA that any conflict of interests arising from the personal and/or other work commitments of HAMA personnel should be managed appropriately to mitigate the impact.

All HAMA personnel who have a direct interaction with clients will be afforded appropriate levels of support and supervision in order to undertake their duties and ensure that their focus remains at all times on the quality of service and ensure all clients receive the best advice available for each individual situation.

All personnel will be expected to be of good character and have the training, skills and experience necessary for the work they are to perform. It is expected that they will consider in each case or situation arising from their involvement with HAMA whether there might be any actual or potential conflict of interests caused by their personal or professional circumstances. This matter will be considered in the recruitment process and on an ongoing basis.

It is also expected that HAMA will keep this in mind during supervision of advisers and act immediately should there be any risk of an adviser or client's welfare being compromised.

HAMA operates as a team and all personnel are expected to play their part in the primary function of providing free, quality debt advice to anyone who needs it and for the good of the service as a whole.

The Policy in Practice

Trustees
Trustees shall inform the other trustees of any interests that may potentially conflict with their role as a trustee of HAMA. Declared conflicts of interests will be taken into account in the discussion of HAMA business by trustees. Where appropriate a trustee might be excluded from discussion or decisions on matters on which they have a conflict of interest.

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Authorised and Regulated by the Financial Conduct Authority: FRN705295

Other personnel
All HAMA personnel must inform the Centre Manager (or in the case of the Centre Manager, the Chair of Trustees) of any interests that may potentially conflict while supporting clients. In addition the adviser will record in the client Case Notes whether there is any conflict of interests for that particular client. This declaration of interest must be reviewed on a regular basis.

Between clients
Whether or not a client has given permission for information to be divulged to another person with whom there are common interests, and whether or not both parties are clients, there may be a change in circumstances which causes those interests to become conflicted. If such circumstances have developed or appear to be developing, the adviser should discuss the case with the Centre Manager/trustees at the earliest opportunity so that the conflicts of interest can be appropriately managed. Permission for sharing information with other parties should be included in the client notes where necessary. Any changes to such permission should be included in the client case notes and signed by the client.

All potential conflicts will be managed by the Centre Manager and the individual involved (or Chair of Trustees in the case of the Centre Manager declaring such interest). Potential conflicts do not preclude the involvement of the individual but the associated risks must be actively managed.

Examples of potential conflicts of interests

1. A trustee has a financial interest in a company that provides services to HAMA.
2. The same adviser sees two or more clients who are related or have interests in common
3. Where one adviser sees married clients or two partners /clients with interests in common and the clients split during the advice.
4. HAMA personnel work in the same field as the client and could potentially benefit from knowledge of the client's circumstances
5. An adviser is employed by one of the client's creditors.
6. A client wants advice about legal action against an individual or corporate body who is a donor or supporter to HAMA.
7. An adviser is approached by client who wants advice about a problem they have with a person who is well known to the adviser (e.g. relative, personal friend, fellow church member, business associate, work colleague etc) or a former client.

Reviewed by trustees 13th January 2026
For review January 2029