

Guidance for trustees

Register of conflicts of interest

July 2018

The Pensions
Regulator

Below is an example of a register that may be maintained by trustees in order to identify and record conflicts of interest. Please note that this is just one of many examples, and any such register needs to be scheme specific. This is the conflicts of interest register referred to in the conflicts procedure adopted by the trustees on [date]. It should be available for inspection at each trustee’s meeting, or on request by any director of one of the joint trustees. It was last updated on [date].

Register of conflicts of interest: known ongoing conflicts

Date identified	Name of trustee	Role in scheme management	Company roles/ membership of scheme	Details of conflict	How notified ¹	Action taken ²	Follow up required	Date resolved

1 Eg verbal declaration at trustee meetings, written conflicts declaration etc
 2 Eg director withdrawing from a decision-making process; disclosure in Annual Report to members

Register of conflicts of interest: newly arisen conflicts

Date identified	Name of trustee	Role in scheme management	Company roles/ membership of scheme	Details of conflict	How notified ¹	Action taken ²	Follow up required	Date resolved

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2 Eg director withdrawing from a decision-making process; disclosure in Annual Report to members

Register of conflicts of interest: newly arisen conflicts continued...

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1 Eg verbal declaration at trustee meetings, written conflicts declaration etc
2 Eg director withdrawing from a decision-making process; disclosure in Annual Report to members

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Free online learning for trustees

www.pensionseducationportal.com

Free online learning for those running public service schemes

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