

Conflict of Interest Policy

This policy applies to all Trustees

1. Why have a policy?

- 1.1 All Trustees have an obligation to act in the best interests of the Charity, and in accordance with Charity's governing document. Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of the Charity.
- 1.2 Such conflicts may create problems; they can:
 - Inhibit free discussion;
 - Result in decisions or actions that are not in the interest of the Charity; and
 - Risk the impression that the Charity has acted improperly.
- 1.3 The aim of this policy is to protect both the Charity and the individuals involved from any appearance of impropriety.

2. The declaration of interests

- 2.1 Accordingly, Trustees must declare their interests, and any gifts or hospitality received in connection with their role in the Charity.
- 2.2 To be effective, the declaration of interests needs to be updated at least annually, and also when any changes occur.
- 2.3 If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. If you would like to discuss this issue, please contact the Chairman of the Board of Trustees for confidential guidance. Interests will be recorded on the governing body's register of interests. The register will be accessible by all Trustees and members of the Charity.

3. Data Protection

- 3.1 The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that Trustees act in the best interests of the Charity. The information provided will not be used for any other purpose.

4. What to do if you face a conflict of interest

- 4.1 If you or a member of your family or other person with whom you are connected has any personal interest, direct or indirect, in any transaction or dealing with, grant by or course of action of the Charity, you should not be involved in decisions relating to that matter. You should declare your interest at the earliest opportunity and withdraw from any subsequent discussion. The same applies if you face a conflict for any other reason. You may, however, participate in discussions from which you may indirectly benefit, for example where the benefits are universal to all, or where your benefit is minimal.

4.2 If you fail to declare an interest that is known to the Chairman of the Board the Chairman will declare that interest.

5. Decisions taken where a Trustee has an interest

5.1 In the event of the Board of Trustees having to decide upon a question in which a Trustee has an interest, all decisions will be made by vote, with a simple majority required. A quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate.

5.2 Interested board members may not vote on matters affecting their own interest and must absent themselves from the discussion.

5.3 All decisions under a conflict of interest will be recorded by the Chairman and reported in the minutes of the meeting. The report will record:

- The nature and extent of the conflict;
- An outline of the discussion;
- The actions taken to manage the conflict.

5.4 Independent external moderation will be used where conflicts cannot be resolved through the usual procedures.