



Statement of intent

This is the Conflict of Interest Policy of Number Champions. In the text below 'we', 'our', 'organisation', and 'the charity' refer to Number Champions.

This policy was approved by the trustees of the Charity on 31 March 2021, and for each subsequent calendar year it should be reviewed and updated by the year end.

This policy should also be reviewed as and when we start to employ any staff.

This policy applies to all trustees. All new trustees shall be given this policy on joining the organisation and shall signify in writing that they have read and understood it, along with completing the register of interests.

Section 1 - Why we have a policy

Conflicts of interests may arise where an individual's personal or family interests or loyalties conflict with those of the charity. Such conflicts might:

- Inhibit free discussion;
- Result in decisions or actions that are not in the best interests of the charity; and/or
- Risk the impression that the charity has acted improperly.

The aim of this policy is to protect both the charity and individuals involved from any such outcome.

The Charity Commission does not require charities to have a policy on conflict of interest, but it does impose clear requirements on charities in its document "Conflicts of interest: a guide for charity trustees" at <https://www.gov.uk/government/publications/conflicts-of-interest-a-guide-for-charity-trustees-cc29/conflicts-of-interest-a-guide-for-charity-trustees>.

The following three headings summarise the headline requirements of this guide.

Identify conflicts of interest

Trustees have a duty to declare conflicts of interest, and the charity should have systems in place to identify such conflicts. The legal definition of a conflict of interest is 'any situation in which a trustee's personal interests or loyalties could, or could be seen to, prevent the trustee from making a decision only in the best interests of the charity'.

Roughly a 'personal interest' is a (typically) financial interest of the trustee or their immediate family, while a 'loyalty' is (typically) membership of or close involvement with an organisation or cause or the possession of religious or ideological views.

'Systems in place' should include investigating potential conflicts in trustee recruitment and having a standing board item asking trustees to identify any interests or loyalties relevant to the agenda, together with the trustees annually updating a register of interests.

Preventing conflicts of interest affecting decisions.

Legally, trustees must make their decisions only in the best interests of the charity. Therefore they must consider conflicts of interest so that any potential effect on decision making is eliminated. In

some cases they will remove the conflict by proceeding with an issue in a different way; in extreme cases they may secure a trustee resignation.

Where this is not possible or not appropriate, trustees:

- must, as a legal requirement, follow the law and the charity's governing document
- should require conflicted trustees to declare their interest at an early stage and, in most cases, withdraw from relevant meetings, discussions, decision making, and votes, and
- may, exceptionally, escalate complex cases to the Charity Commission.

A 'trustee benefit' is where a trustee or a person or company closely connected to the trustee receives some payment, whether or not this is legitimate. The definition is drawn widely.

Where a decision involves a potential trustee benefit, then as legal requirements, the benefit must be properly authorised and the trustee must follow any conditions attached to the decision.

Our own constitution (clause 7) requires trustees (i) to declare any interest which they may have in an actual or proposed activity of the charity (ii) not to take part in board discussions where they have a personal interest which might conflict with, or be seen to conflict with, their acting solely in the best interests of the charity. This policy clarifies how these requirements should be actioned.

Recording conflicts of interest

Trustees should formally record any conflicts of interest and how they were handled. Also, if the charity prepares accruals accounts, these must disclose any trustee benefits.

Section 2 – Declaring interests

All trustees must declare their relevant interests, together with any gifts or hospitality received in connection with their role in the charity. A declaration of interests form is provided below for this purpose.

The trustees have evaluated that the charity currently has relatively low risk from the viewpoint of conflicts of interest, and therefore our requirements for disclosure of interests do not extend beyond the individuals and their partners or spouse. This will be reviewed as part of the annual review of this policy.

For the same reason we restrict mandatory declaration of personal interests to employment or self-employment, and of loyalty to being a trustee or holding a similar position of authority in another charity or pro-bono organisation.

We do however also require trustees to declare other interests which they evaluate as being more likely than not to create a relevant conflict of interest in the coming year

Trustees must update their declaration of interests at least annually, and also when any changes occur.

The board shall appoint a designated trustee to receive updated declarations from all trustees annually on the 30 November and also on intervening dates when there are changes. The list of interests shall be reviewed at the board following each 30 November and the designated trustee shall advise the board where there are changes in the list of interests outside the annual cycle. The declarations of interest will not be revealed to any person not a trustee and will be deleted after 6 years.

The designated trustee is Lisa Baglin.

As part of the first item of each board meeting, the chair of the meeting shall require trustees to identify any conflict of interest or conflicts of loyalty which they have relevant to items on the agenda, whether or not these conflicts are recorded in the declaration of interests.

Section 3 – preventing conflicts of interest affecting decision making

Where a decision outside a meeting of the board of trustees involves a conflict of interest or loyalty, then the trustee involved shall declare this. If the situation cannot be resolved by a method which removes the conflicted person from the decision-making process, then it shall be escalated to the chair of the charity and if necessary to a meeting of the board of trustees.

The rest of this section refers to the process for handling conflicts of interest at meetings of the board of trustees.

At the start of the meeting, the meeting chair shall ask trustees to declare any conflict of interest or of loyalty relating to any agenda item. Each trustee shall declare any such interest or loyalty, including those of their close family, whether or not it is recorded on the declaration of interests.

A trustee with a conflict of interest shall not take part in a discussion, or be counted in the quorum, or vote on that agenda item.

Where there is a conflict of loyalty, the meeting (with the conflicted trustee not voting) shall decide how great a risk this presents to the trustee being influenced or being seen to be influenced to take a decision other than for the best interests of the charity. If the risk is judged to be high, then it will be treated as for a conflict of loyalty. If it is judged to be medium, then the trustee shall not vote and shall not take part in the body of the discussion, but shall be counted in the quorum and may make a statement beforehand. If the risk is judged to be low, then the trustee shall take part as normal.

Section 4 - Recording conflicts of interest

Where there is a conflict of interest or loyalty at a board meeting, the minutes shall record:

- the nature of the conflict
- which trustee or trustees were affected
- whether any conflicts of interest were declared in advance
- an outline of the discussion
- whether anyone withdrew from the discussion
- how the trustees took the decision in the best interests of the charity.

Where a conflict of interest or loyalty outside a board meeting is resolved other than by escalation to a board meeting, then a written record should be compiled following the pattern above and sent to the chair of the charity. If the chair is closely involved, the record shall be sent to all trustees.

Although Number Champions currently prepares accounts on a cash basis, we shall provide relevant disclosures required for charity accounts made on an accruals basis. That is, we shall disclose details of payments and other benefits to charity trustees and connected persons, including family members and businesses, and we shall say under what legal authority the payments are made.

Conflict of Interest Policy Declaration

Policy dated 31 March 2021

As a trustee of Number Champions, I confirm that I have read and understood this policy and am bound by it. I give below the full list of interests that I or my spouse/partner have within the categories of:

- Employment
- Self-employment
- Trustee roles or similar positions of responsibility at charities or other pro-bono organisations
- Hospitality or gifts above the value of £10 received in the last year from any school or from any organisation or person likely to have a business relationship with Number Champions.

I have also included items not covered by the above where which I believe are more likely than not to create a relevant conflict of interest in the coming year.

I confirm that I will inform Number Champions promptly of any additions to this list.

I confirm that I will advise at any board meeting if I have any potential conflict of interest relating to an item to be discussed, extending to interests of all persons connected to me as well as my spouse/partner, and including loyalties not represented by an official position, whether or not the interest is included in the list below.

Description of interest, hospitality, or gift	Self or connected person (describe)

Name

Signature

Date