

ART EXPLORA UK (REGISTERED CHARITY NO. 1202489)

CONFLICTS OF INTEREST POLICY

Date of Last Review: 27 February 2026

Part 1: Introduction and Duties

INTRODUCTION

1.1 This document describes the Policy for conflicts of interest and conflicts of loyalty for the Trustees and Member(s) of Art Explora UK (the **Charity**) and sets out guidelines and procedures for identifying, monitoring and managing actual and potential conflicts. It is important that the Trustees do not materially benefit in any way from their position, and for actual, potential and perceived conflicts to be proactively managed.

1.2 The Charity Commission considers it good practice for Trustees to implement a conflicts of interest policy. The Commission's guidance for Trustees on conflicts of interest (last updated October 2023) is available on its website at:

<https://www.gov.uk/government/publications/conflicts-of-interest-a-guide-for-charity-trustees-cc29>

Trustees should also have regard to the Charity Commission's guidance *The Essential Trustee (CC3)* and ensure that conflicts are managed consistently with their overarching legal duties.

1.3 The procedures in this policy will enable Trustees to identify and manage conflicts of interest so that they can ensure that conflicts do not prevent them from making decisions in the best interest of the Charity. The policy will also help protect the Charity and its Trustees and Member(s) from any appearance of impropriety in cases where conflicts arise.

1.4 This policy should be read in conjunction with the Charity's Constitution and in particular clause 7 of the Constitution. The provisions of the Constitution take precedence over this policy.

DEFINITIONS

In this policy

2.1 References to "**conflicts**" and "**conflicts of interest**" include actual and/or potential conflicts of interest and/or duty (loyalty), unless the context requires otherwise.

2.2 Persons who are "**connected**" with a charity trustee means:

2.2.1 a child, stepchild, grandchild, parent, brother or sister of a charity trustee;

2.2.2 the spouse, unmarried partner or civil partner of a charity trustee or of any person falling within paragraph (i) above;

2.2.3 any person who is in a business partnership with a charity trustee or any person who is in a business partnership with any person falling within paragraph (i) or (ii) above; and

2.2.4 any company, business, trust, or organisation in which a charity trustee (or any other person connected to them) has an interest as a beneficiary or through ownership, control or influence.

If in doubt about whether a person is connected, a Trustee should seek advice from a solicitor or other person qualified to advise on the matter.

2.3 "**Benefit**" includes any payment or material benefit (including property, loans, goods and services), other than reasonable out of pocket expenses.

2.4 Any reference in this policy to "the **Charity**" shall also be deemed to include a reference to all and any of its associated companies.

PURPOSE

3.1 The purpose of this policy is to enable the Trustees to identify conflicts of interest and take appropriate action, so that they can ensure that conflicts do not prevent them from making decisions in the best interests of the Charity.

3.2 The Trustees are under a duty to act in the best interests of the Charity. This means that they must not place themselves in a position where they have, or may have, a direct or indirect interest that conflicts with their duties as a Trustee. Additionally, they must not profit from their position as a Trustee.

3.3 If and when any conflict arises, the issue is not the integrity of the person concerned, but ensuring the appropriate action is taken so

that the conflict does not affect the decision-making process.
Conflicts can create difficulties in that they might:

3.3.1 inhibit free and open discussion of issues affecting the Charity or its interests;

3.3.2 lead to irrelevant considerations being taken into account during decision making;

3.3.3 result in decisions or actions taken which are not in the best interests of the Charity; or

3.3.4 risk damaging the reputation of the Charity if it appears that the Trustees are influenced by personal interests or loyalties.

All Trustees must therefore be alert to the possibility that they, or their co-Trustees, could be affected by a conflict of interests.

CHARITY TRUSTEES - DUTIES

- 4.1 Each Trustee of a CIO has a duty under the Charities Act 2011 to exercise the powers and perform the functions that he or she has in that capacity in the way that the Trustee decides, in good faith, would be most likely to further the purposes of the Charity.
- 4.2 Under the Charitable Incorporated Organisations (General) Regulations 2012 (the "**Regulations**"), a Trustee who stands to benefit, whether directly or indirectly, from a transaction or arrangement with the CIO must not take part in the decision. The affected Trustee must not be counted in the quorum for that part of the business. This duty does not apply where the transaction or arrangement cannot reasonably be regarded as likely to give rise to a conflict of interest.
- 4.3 The Regulations provide that a charity trustee of a CIO must not accept any benefit from a third party conferred by reason either of (a) him or her being a charity trustee or (b) him or her doing (or not doing) anything as a charity trustee of the CIO. This duty is not infringed if the acceptance of the benefit cannot reasonably be regarded as likely to give rise to a conflict of interest.

MEMBERS - DUTIES

- 5.1 The Member(s) of a CIO have an important constitutional role, and the Charity's Constitution gives the Member(s) the right to:

- 5.1.1 appoint replacement Trustees in the event that a trustee is removed from their position by the Founder or the Member(s) of the Charity;
 - 5.1.2 amend the constitution of the CIO;
 - 5.1.3 amalgamate the CIO with, or transfer its undertaking to, one or more other CIOs, in accordance with the Charities Act 2011;
 - 5.1.4 wind up or dissolve the CIO (including transferring its business to any other charity); or
 - 5.1.5 appoint new Members of the CIO.
- 5.2 The Member(s) owe fiduciary duties to the Charity and, in particular, owe a duty of single-minded loyalty to the Charity's charitable objects.
- 5.3 Section 220 of the Charities Act 2011 further requires that 'each member of a CIO must exercise the powers that the member has in that capacity in the way that the member decides, in good faith, would be most likely to further the purposes of the CIO'.
- 5.4 Each Member must therefore always act in the best interest of the Charity. Each Member must exercise his or her powers, and carry out his or her functions as a Member of the CIO, in the way that the Member decides, in good faith, would be most likely to further the purposes of the Charity.

Part 2: Identifying Conflicts

IDENTIFYING CONFLICTS OF INTEREST

- 6.1 A conflict of interest is any situation in which a Trustee's direct or indirect interests could, or could be seen to, prevent them from making a decision only in the best interests of the Charity. There are two types of conflict:
- 6.1.1 **Conflicts of interest** may arise where a Trustee (or a person connected to them) stands to obtain a benefit from the Charity; and
 - 6.1.2 **Conflicts of loyalty** may arise where a Trustee has a duty of loyalty to a third party that conflicts with their duty to the Charity.
- 6.2 When considering if they have a conflict, a Trustee must be aware of the following principles:

6.2.1 a conflict exists if there is a possibility that the Trustee's personal interest could influence their decision-making, even if the charity trustee's decision-making is not in fact adversely affected by the conflict. A reasonable perception that a conflict exists can be enough for a charity trustee to be in breach of their duties; and

6.2.2 the interest that gives rise to a conflict may be direct or indirect and, in particular, a conflict may relate to the interests of someone who is connected to a charity trustee as well as to their own personal interests.

6.3 Examples of conflicts of interest can be found in paragraph 3 of the Charity Commission's Guidance CC29 (see paragraph 1.2 above). It is impossible to set out every situation which may result in a conflict, but common situations include:

6.3.1 selling, loaning or leasing Charity assets to a Trustee (or a person connected to them);

6.3.2 acquiring, borrowing or leasing assets from a Trustee (or a person connected to them);

6.3.3 the exploitation by a Trustee (or a person connected to them) of any property, information or opportunity of which they become aware while acting as a Trustee or Member;

6.3.4 unless otherwise agreed, paying a Trustee (or a person connected to them) for providing a service and/or goods to the Charity;

6.3.5 making a grant to a Trustee (or a person connected to them) or determining the Charity's grant-making policy where the Trustee (or a person connected to them) is a beneficiary;

6.3.6 making decisions in relation to service provision where a Trustee (or a person connected to them) is a service user;

6.3.7 a transaction between the Charity and its trading subsidiary (or another charity) where a Trustee is a director (or charity trustee) of both entities, and the transaction results in the Charity receiving a substantial asset from, or transferring a liability to, the other entity;

6.3.8 employing a person connected to a Trustee at the Charity;

6.3.9 when a Trustee (or a person connected to them) owes a legal obligation or duty towards another organisation or person (for

example, an employer or another charity of which they are a charity trustee) that conflicts with the Trustee's duty to the Charity;

6.3.10 when a Trustee has a personal sense of loyalty to another organisation or person that conflicts with their loyalty to the Charity; and

6.3.11 when a Trustee has religious or political views that could interfere with their ability to make decisions in the interest of the Charity.

Part 3: Declaring and Recording Conflicts

PROCEDURE FOR DECLARING INTERESTS

7.1 Trustees have a personal responsibility to declare any interest that might reasonably be regarded as potentially giving rise to a conflict.

7.2 On appointment, and thereafter at least once annually, all Trustees must complete a Declaration of Interests form:

7.2.1 listing any personal interests, business interests or other direct or indirect interests that might potentially give rise to a conflict of interests. This includes any property, information or opportunity that a Trustee holds that could potentially be exploited by

the Charity (whether or not the Charity could take advantage of that property, information or opportunity);

7.2.2 listing any interests of persons connected to them that may potentially give rise to a conflict of interest;

7.2.3 declaring any gifts or hospitality received or offered to them in their capacity as a Trustee provided that any such gifts under the value of £25 do not need to be disclosed and any such hospitality under the value of £25 and provided in the normal course of business does not need to be disclosed;

7.2.4 confirming that they are now aware of any conflict, other than those already disclosed, that exists between their role and their personal circumstances or other interests;

7.2.5 confirming that they will update the form annually, or sooner if any changes occur; and

7.2.6 confirming that they will declare any conflict that arises in the future.

7.3 The Declaration of Interests should be sent to the person responsible for dealing with the day-to-day administration of the Charity (the **Manager**) for inclusion in the Charity's Register of Interests (the **Register**).

7.4 It is for each individual Trustee to decide which matters to declare but, if in doubt, they should make a declaration. If a Trustee would like to discuss the issue, they may contact the Manager for confidential guidance.

DECLARATION OF INTERESTS - REGISTER OF INTERESTS

8.1 All interests declared in accordance with this policy must be recorded in a Register of Interests (the **Register**). All interests declared in accordance with this policy shall be recorded in the Register.

8.2 The Register will be maintained by the Manager, who will:

8.2.1 update the Register as necessary with details notified in accordance with this Policy;

8.2.2 record in the register all conflicts, interests, gifts and hospitality declared by Trustees; and

8.2.3 send amendments or additions to the Register (if any) to the chair prior to each Trustee meeting.

8.3 Each Trustee must promptly notify the Manager of any changes to their Declaration of Interests either in writing when they arise or immediately following the meeting of the Trustees at which they were first declared, as applicable.

8.4 At least once in every 12-month period, all the Trustees must review the information relating to them contained in the Register and declare that the information is correct or make a further declaration if necessary.

8.5 Where the Register has been amended between meetings, it will be circulated by the chair at the Trustee meeting following notification. The contents of the current Register of Interests will otherwise be taken as read at each meeting. This represents general notice of notified interests but specific conflicts arising should still be declared at meetings where relevant.

8.6 The Register will be open to inspection by the Trustees, the auditors of the Charity from time to time, the Charity Commission and any other entity or body that has a legal right of access to it.

8.7 The information provided by Trustees will be processed in accordance with the UK GDPR and the Data Protection Act 2018. Data will be processed only for the purposes set out in this policy and not for any other purpose.

PROSPECTIVE TRUSTEES AND MEMBERS

9.1 Before a prospective Trustee is appointed, they must be asked to declare any direct or indirect interests they have that might give rise to a conflict of interests.

9.2 If the Trustees consider it likely that the prospective Trustee will be subject to serious or frequent conflicts of interest, the charity trustees should consider whether it is appropriate to proceed with the appointment.

9.3 Where a new Member is appointed, if the Member(s) (or the Trustees if the appointment is made in accordance with clause 16.2.5 of the Constitution), consider it likely that the prospective Member will be subject to serious or frequent conflicts of interest, the Members (or Trustees) should consider whether it is appropriate to proceed with the appointment

DECLARATIONS OF INTEREST AT A MEETING OF THE TRUSTEES

10.1 The first item on the agenda of each Trustee meeting will be a standing item requiring all Trustees attending the meeting to declare any conflicts of interest relating to the matters to be discussed at the meeting.

10.2 If a Trustee considers that they have an actual or potential conflict, they must inform the chair as soon as possible and always before any discussion of the relevant matter. The declaration must specify the nature and extent of any direct or indirect interest that gives rise to the conflict.

10.3 If a Trustee is aware that another Trustee has an actual or potential conflict that has not been declared, they must notify the chair.

10.4 If the chair is declaring a conflict, they must inform the other Trustees.

- 10.5 If a Trustee is uncertain whether or not they are conflicted, they must err on the side of openness and declare the interest.
- 10.6 All conflicts declared at a Trustee meeting must be recorded in the minutes of the meeting in which they were declared or, if not declared in a meeting, in the minutes of the next charity trustee meeting. Following the meeting, the declaring Trustee must immediately notify the Manager of their declaration in writing.

PROCEDURE FOR DECLARING INTERESTS IN TRANSACTIONS AND ARRANGEMENTS

- 11.1 A Trustee who has a direct or indirect interest in any proposed transaction or arrangement must declare the nature and extent of that interest before the transaction or arrangement is entered into.
- 11.2 If a Trustee has a direct or indirect interest in a transaction or arrangement that has already been entered into by the Charity but has not declared that interest, they must declare the nature and extent of that interest as soon as is reasonably practicable.
- 11.3 If a declaration made under paragraph 11.1 or 11.2 proves to be or becomes inaccurate or incomplete, the conflicted Trustee must make a further declaration giving correct information about the nature and extent of their interest.
- 11.4 A declaration made under paragraph 11.1, 11.2 or 11.3 must be made either at a meeting of the Trustees or by sending written notice to the other Trustees.
- 11.5 A Trustee may give general notice that they or a person connected to them has an interest in a specified company, business or organisation and is to be regarded as interested in any transaction or arrangement with that company, business or organisation that may be entered into by the Charity, after the date of the notice. Such notice must be given at a meeting of the Trustees or the relevant Trustee must take reasonable steps to ensure that it is brought up and read at the next meeting of the Trustees after it is given. The notice must state the nature and extent of the interest that the Trustee or a person connected to them has in the company, business or organisation.

Part 4: Managing Conflicts

PROCEDURE FOR ASSESSING CONFLICTS AT MEETINGS

- 12.1 At the start of each meeting of the Trustees:

12.1.1 the chair must inform the other Trustees and the secretary to the Charity of any conflict of interest that has been declared by a charity trustee that relates to the business to be discussed at the meeting; and

12.1.2 the chair will circulate any amendments or additions to the register of Trustees' interests made since the last meeting of the Trustees.

12.2 The way in which conflicts are dealt with will depend on the nature and extent of the conflict. The non-conflicted Trustees must therefore:

12.2.1 assess the nature and extent of the conflict;

12.2.2 assess the risk or threat to decision-making by Trustees;

12.2.3 decide whether the conflict is serious (for example, the conflict is acute or extensive, will or may be seen to prevent the Trustees from making decisions in the best interests of the Charity, relates to a significant decision or risks significantly damaging the Charity's reputation); and

12.2.4 decide what steps to take to handle the conflict.

When considering the conflict, Trustees must take all relevant factors into account, make decisions only in the best interests of the Charity and always protect the Charity's reputation.

12.3 The conflicted Trustees must not take part in any discussion or decision about the conflict and how to handle it and will not be counted in the quorum for that part of the meeting.

12.4 The non-conflicted Trustees must consider whether it is necessary to seek the advice a legal adviser on whether the conflict is serious and/or on how to manage the conflict declared.

AUTHORISED CONFLICTS OF INTEREST

13.1 The Trustee's duty to avoid a conflict of interest does not apply if, and to the extent that, the conflict of interest is authorised by any of the following:

13.1.1 An express provision in the Charity's governing document;

13.1.2 a statutory provision, such as the powers in the Charities Act 2011 to:

- (a) pay a charity trustee (or a connected person) for providing services to the charity (sections 185 to 188); or
- (b) take out and pay premiums for trustee indemnity insurance (section 189); or
- (c) the Charity Commission or the court.

In each case, the Trustee must always follow any conditions that apply to the authorisation. Any trustee benefit must be clearly in the Charity's best interests and properly recorded in accordance with Commission guidance.

PROCEDURES FOR MANAGING CONFLICTS

14.1 If the conflict arises owing to a financial transaction between the Charity and a Trustee (or a connected person), or because a Trustee (or a connected person) will or may obtain a benefit from the Charity:

14.1.1 any potential or proposed benefit must be authorised in advance (see section 13 (Authorised conflicts of interest) above); and

14.1.2 the conflicted Trustee must:

- (a) withdraw from all discussions and decisions in relation to the matter; and
- (b) not be counted in the quorum for that part of the meeting.

14.2 If the non-conflicted Trustee decide that a conflict is serious, they must consider:

- (a) securing the conflicted Trustee's resignation and/or appointing a new Trustee who is not conflicted;
- (b) not pursuing the course of action that gives rise to the conflict or proceeding in a different way so that the conflict does not arise;
- (c) seeking independent, expert advice about how to handle the conflict; and (d) asking the Charity Commission for guidance.

14.3 If a conflict is not serious, the non-conflicted Trustees must decide what procedures and level of participation by the conflicted Trustee are appropriate. A number of steps can be taken to deal with the conflict, including:

14.3.1 requiring the conflicted Trustee to withdraw from the meeting for the relevant item and not to be counted in the quorum for that part of the meeting;

14.3.2 allowing the conflicted Trustee to remain in the meeting for the relevant item to take part in the discussion, but requiring them to withdraw from the meeting during decision-making and to have no right to vote on the matter; or

14.3.3 appointing a new, non-conflicted Trustee.

14.4 If the non-conflicted Trustees decide that the conflict is low risk (in that it will not prevent the conflicted Trustee from making decisions in the best interests of the Charity), they may agree that the conflicted Trustee may continue to participate in discussions and the decision-making process.

14.5 The chair must inform the conflicted Trustee of the non-conflicted Trustees' decision about how to manage the conflict.

14.6 The minutes of the relevant meeting must include a record of the nature and extent of the conflict, an outline of the discussion and the actions taken to manage the conflict.

14.7 Where a Trustee or a connected person receives a payment or benefit from the Charity, this must be reported in the annual accounts in accordance with the current Statement of Recommended Practice for accounting by charities (Charities SORP).

DECISIONS TAKEN WHERE A TRUSTEE HAS AN INTEREST

15.1 Any conflict of interest declared at a meeting of the Trustees must be recorded in the minutes of the meeting. The minutes must record:

15.1.1 the nature and extent of the conflict;

15.1.2 an outline of the discussion; and

15.1.3 the actions taken to ensure that the conflict did not affect the decision-making process.

- 15.2 Where a Trustee or a connected person receives any benefit from the Charity, this will be reported in the Annual Report and Accounts in accordance with the Charities SORP.

ADVISORS AND CONFLICTS

- 16.1 Before appointing any advisers to the Charity, the charity trustees must consider whether the adviser has, or may be seen to have, any actual or potential conflict with the interests of the Charity.
- 16.2 All advisers to the Charity must be appointed by the charity trustees under the terms that include:
- 16.2.1 an obligation to inform the charity trustees if any circumstances arise in which they are or may be conflicted; and
 - 16.2.2 an obligation to address any conflicts that arise in the work they do for the charity trustees.

Part 5: Specific Conflicts

CONFLICTS ARISING IN RELATION TO ART EXPLORA UK LIMITED

- 17.1 Any Trustee who is a director, employee or consultant of Art Explora UK Limited will owe legal duties to Art Explora UK Limited in that capacity and as such will from time to time have a conflict of loyalty relating to decision making relating to the Charity. These conflicts must be recognised and carefully managed.
- 17.2 In the event that such a conflict arises the conflicted Trustee will be required to absent himself or herself from discussions of the Trustees and must not vote or be counted in the quorum and the provisions of paragraph 14 and 15 of this policy must be followed.
- 17.3 A Trustee must comply at all times with his or her statutory and fiduciary duties (see paragraphs 4 and 5 above) and therefore must absent himself or herself from the meeting if they consider that this is necessary to comply with such statutory duties.
- 17.4 Examples of situations which may arise from time to time where Trustees connected to Art Explora UK Limited will have a conflict of loyalty include, but are not limited to, the following situations:
- 17.4.1 If Art Explora UK Limited would provide restricted or conditional funding to the Charity;

17.4.2 If Art Explora UK Limited and the Charity would share resources; or

17.4.3 If a Trustee is employed by, or enters into a contract for services with, Art Explora UK Limited;

CONFLICTS ARISING IN RELATION TO ART EXPLORA (FRANCE)

18.1 Any Trustee who is a trustee, employee or consultant of Art Explora (France) will owe legal duties to Art Explora (France) in that capacity and as such will from time to time have a conflict of loyalty relating to decision making relating to the Charity. These conflicts must be recognised and carefully managed.

18.2 In the event that such a conflict arises the conflicted Trustee will be required to absent himself or herself from discussions of the Trustees and must not vote or be counted in the quorum and the provisions of paragraph 15 of this policy must be followed.

18.3 A Trustee must comply at all times with his or her statutory and fiduciary duties (see paragraphs 4 and 5 above) and therefore must absent himself or herself from the meeting if they consider that this is necessary to comply with such statutory duties.

18.4 Examples of situations which may arise from time to time where Trustees connected to Art Explora (France) will have a conflict of loyalty include, but are not limited to, the following situations:

18.4.1 The negotiation of a joint venture or collaboration agreement between Art Explora (France) and the Charity;

18.4.2 If Art Explora (France) would like the Charity to support particular projects;

18.4.3 If Art Explora (France) would like the Charity to use particular suppliers; or

18.4.4 If any projects the Charity is looking to support would directly or indirectly benefit Art Explora (France), for example enhance its ability to win work in a particular geographical area or sector.

Part 6: Monitoring, Reviewing and Enforcing this Policy

MONITORING, REVIEW AND ENFORCEMENT

19.1 This policy must be reviewed every three years, or sooner if required, by the Manager.

19.2 A Trustee shall not be in breach of this policy by reason of a failure to disclose an interest of which he/she has no knowledge and of which it is unreasonable to expect him/her to have knowledge.

19.3 Any Trustee who becomes aware of a breach of this policy must report it to the Manager as soon as possible. The Manager must report all breaches of the policy of which they are aware to the Chair as soon as possible and always ahead of the next Trustee meeting.

19.4 The Chair must:

19.4.1 report all breaches of the policy of which they are aware to the Trustees at the next Trustee meeting; and

19.4.2 ensure that all breaches are noted in the minutes of the relevant Trustee meeting.

19.5 The charity trustees have implemented this policy in order to monitor and manage conflicts of interest. Any failure to comply with the terms of this policy will not, in itself, result in a decision of the charity trustees being invalidated or in any liability to the Charity's beneficiaries.

TRAINING

20.1 All newly appointed Trustees must receive training on this policy and on identifying situations that may result in a conflict and ways in which conflicts can be managed in practice.

20.2 Trustees must be familiar with the principles contained in the Charity Commission's guidance on conflicts (see paragraph 1.2).

APPENDIX 1

Art Explora UK (Registered Charity Number [XXXXXXXX] (the "Charity"))

Declaration of Interests Form

As a Trustee of the Charity, you are required by the Charity's conflicts of interest policy (**Conflicts Policy**) to declare any personal interests, business interests or other direct or indirect interests that might potentially conflict with your duties as a Trustee. Please read the Conflicts Policy before completing this declaration.

I _____ as a Trustee of the Charity have set out my interests below.

Type of Conflict	Please give details and specify whether interest applies to you or, where appropriate, a member of your immediate family or some other close personal connection.
Directorships of other companies, and equivalent offices in unincorporated organisations or other bodies. This includes board membership, or equivalent, of voluntary or charitable organisations, public or government bodies and educational organisations.	
Partnerships in any business or other venture.	

Shareholdings or other financial or ownership interests in, or membership of, or employment by organisations, which are, or are likely to be competitors, or customers of or suppliers to the Charity provided that such interests do not need to be disclosed where they cannot reasonably be considered to give rise to an actual or potential conflict of interest.	
Any financial or ownership interests in any property purchased, used, or occupied by the Charity.	
Any loans of money or property made to the Charity.	
Any other dealings with the Charity by which the Charity Trustee stands to gain financially or in some other manner.	

Any benefit which is received or available from the Charity, whether as a director, trustee or otherwise (apart from reasonable out-of-pocket expenses).	
Any gifts and hospitality received from external bodies wholly or partly as a consequence of the Charity Trustee's position at the Charity or associated company provided that any such gifts under the value of £25, and any such hospitality under the value of £25 and provided in the normal course of business, does not need to be disclosed.	
Any other interest, activity or relationship which does or might give rise to a conflict of interest with the Charity, or which is or might be prejudicial to the Charity, its reputation or good standing, or which does or might compromise the Charity Trustee's ability to perform their duties exclusively in the interests of the Charity.	

DATA PROTECTION, CONFIRMATION AND UNDERTAKING

1 I consent to the information contained in this declaration being used for the purposes described in the Charity's Conflicts Policy and for no other purpose.

2 I confirm that, to the best of my knowledge:

2.1 The information contained in this declaration is complete and accurate; and

2.2 I am not aware of any other potential conflicts, other than those contained in this declaration, that exist between my role as a Trustee and my personal or other interests.

3 I undertake to:

3.1 review this declaration at least once in every 12-month period and update it if necessary;

3.2 update this declaration as and when my circumstances change; and

3.3 declare promptly any conflict that arises in the future.

Signed:

Name

Date
