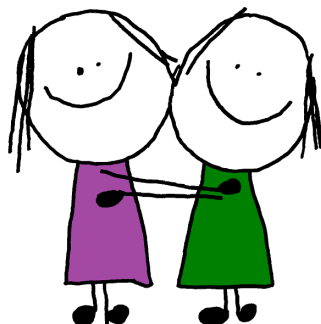


Friends – Play for Disabled Children



Friends – Play for Disabled Children
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Registered Charity Number: 1167995

Conflict of Interest Policy

Status: Approved

Approval date: 2 October 2026

Version: 1.0

Next review: October 2027

1. Purpose

Friends – Play for Disabled Children (“Friends”) is committed to making decisions in the best interests of the charity.

Trustees must identify, declare and appropriately manage any situation where their personal interests, relationships or responsibilities to another organisation could influence, or appear to influence, a decision made on behalf of Friends.

This policy explains how conflicts of interest will be identified, recorded and managed.

2. What is a conflict of interest?

A conflict of interest arises where a trustee’s personal interests or responsibilities to another person or organisation could affect, or reasonably be seen to affect, their ability to make an impartial decision in the best interests of Friends.

A conflict may be:

- **financial**, where a trustee or someone connected to them could benefit financially; or
- **a conflict of loyalty**, where a trustee has responsibilities or loyalties to another organisation, person or group.

A conflict does not mean anyone has acted improperly. It simply means the situation needs to be declared and managed appropriately.

3. Examples

Examples may include where a trustee:

- owns or works for a business that Friends is considering buying from;
- has a close family member who may receive payment from Friends;
- is a trustee, director, employee or office holder of another organisation Friends is considering working with;
- is involved with another charity or community group that may benefit from a Friends decision;
- has a personal relationship with someone affected by a decision;
- could personally benefit from a contract, grant, booking or other decision; or
- has another interest that could reasonably affect their independence.

4. Declaring interests

Trustees must declare relevant interests:

- when they become a trustee;
- whenever a new interest arises;
- annually when the Register of Interests is reviewed; and
- before discussion of any matter where a conflict may arise.

If a trustee is unsure whether something should be declared, it is better to declare it.

5. Register of Interests

Friends will maintain a Register of Interests for trustees.

This may include:

- employment or business interests;
- trustee or committee roles in other organisations;
- significant voluntary roles;
- relevant family or personal connections; and
- other interests that could reasonably create a conflict.

The register will be reviewed at least annually and updated when circumstances change.

Not every connection will create an actual conflict, but recording it helps Friends identify potential conflicts early.

6. Managing conflicts

When a conflict is declared, the remaining trustees will decide how it should be managed.

Depending on the circumstances, this may include:

- recording the declaration only;
- allowing the trustee to provide factual information but not participate in the decision;
- asking the trustee to leave the discussion;
- excluding the trustee from voting;
- obtaining alternative quotes or information;
- seeking independent advice; or
- deciding not to proceed with a proposed arrangement.

The action taken should be proportionate to the nature of the conflict.

7. Recording decisions

Where a conflict arises, Friends should record:

- the nature of the conflict;
- who declared it;
- how the conflict was managed;
- who took part in the decision; and
- the decision reached.

This may be recorded in meeting notes, minutes or another appropriate trustee record.

8. Payments and benefits to trustees

Trustees must not receive payment or other significant benefit from Friends unless this is properly authorised and permitted by the charity's governing document and applicable charity law.

Any proposed payment or benefit involving a trustee or connected person must be declared before a decision is made.

9. Connected persons

Trustees should also declare relevant interests involving people closely connected to them where those interests could influence a Friends decision.

This may include:

- spouse or partner;
- close family members;
- business partners; or
- organisations in which they have a significant interest.

10. Conflicts involving other organisations

A trustee's involvement with another charity, community group, school, PTA, business or organisation does not automatically prevent Friends from working with that organisation.

However, the connection should be declared where Friends is considering a decision involving that organisation.

For example, if Friends were considering collaboration, funding, bookings, contracts, referrals or another formal arrangement involving an organisation where a trustee holds a position, that trustee should declare the interest before the decision is made.

11. Quorum and decision-making

Where a trustee is excluded from a decision because of a conflict, the remaining trustees must ensure that any decision is made in accordance with the charity's governing document and any applicable quorum requirements.

If too many trustees are conflicted for a proper decision to be made, the trustees should seek appropriate advice before proceeding.

12. Failure to declare an interest

If a trustee fails to declare a relevant interest, the trustees will consider:

- the seriousness of the omission;
- whether any decision was affected;
- whether the decision should be reconsidered;
- whether any corrective action is required; and
- whether the matter raises wider governance concerns.

13. Review and approval

This policy will be reviewed:

- at least annually;
- where trustee roles or circumstances change;
- after a significant conflict issue; or
- where relevant Charity Commission guidance changes.

Approved by: Friends – Play for Disabled Children Trustees

Approval date: 2nd October 2026

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