Unipol Student Homes

Conflicts of Interest Policy and Procedure



Policy Information

Policy Owner	Company Secretary
Issue Version	1.0
Responsible Committee	Governance Committee
Adopted by Board date	17th September 2026
Review cycle	Annual
Last review date	17th September 2026
Next review date	September 2027

1. Introduction

1.1 The Charity Commission places significant weight on the independence of charity Trustees and Trustees have a duty to avoid conflicts of interest. Under the current Articles of Association, the charity's governing document, Unipol has 4 Principal Members; Leeds Beckett University, The University of Leeds, Leeds Beckett Students' Union and Leeds University Union. These Members nominate the majority of the Trustees to the charity's Board. Whilst it is hoped there will never be a serious conflict of interest even when the charity is contracting with one of its members or agreeing upon their level of subscription, Trustees may feel a sense of loyalty to the nominating institution. Whilst those nominated Trustees are required to act and take decisions without external influence, the connection with their nominating institution creates a risk of a conflict arising.

1.2 This Conflicts of Interest policy:

- ensures Trustees understand what a conflict of interest is;
- ensures the Charity is consistent in how it manages conflicts;
- shows that the Charity is meeting its legal duties;
- shows that the Charity takes conflicts seriously.

1.3 In addition to 1.1, Conflicts of interests may arise where an individual Trustee's personal or family interests and/or loyalties conflict with those of the charity. Such conflicts may create problems that:

- inhibit free discussion (potential conflicts);
- result in decisions or actions that are not in the interests of the charity (actual conflicts); or
- risk the impression that the charity has acted improperly (perceived conflicts).

1.4 Trustees are required to follow the provisions on managing conflicts and potential conflicts of interest set out in the charity's governing document, the Articles of Association, which necessitates identification, declaration, removal, management and recording of all actual and perceived conflicts of interest and loyalty.

2. Scope

2.1 This policy applies to Trustees (who are also Directors) of the Charity and company limited by guarantee Unipol Student Homes.

3. Why we have a policy

3.1 Trustees have a legal obligation:

- to act in the best interests of Unipol Student Homes to further its Objects as outlined in the Articles
- to apply the Charity's income and property only in accordance with the Objects
- to avoid situations where their personal interests conflicts with these duties.

3.2 The aim of this policy is to protect both the Charity and Trustees involved from any actual or appearance of impropriety, and to protect the charitable Objects, assets, independence and reputation of the Charity, particularly in relation to the independence of its national accreditation operations. Failure to deal with conflicts appropriately can be extremely damaging to the Charity's public reputation and can lead to regulatory intervention.

4. What is a conflict of interest and conflict of loyalty?

4.1 A "conflict of interest" is where an individual's personal interests (in particular financial interest) or connection to another person could, or could appear to, prevent that individual from making a decision only in the Charity's best interests. A connected person that could give rise to a conflict of interest could include, for example, a Trustee's spouse or civil partner, immediate family, business partner or businesses where a trustee has an interest through ownership or influence.

4.2 A "conflict of loyalty" is where an individual owes a loyalty to another person or organisation, and that loyalty could, or could appear to, prevent that individual from making a decision only in the Charity's best interests, even though the individual has no financial interest in the matter. Here, the individual does not stand to gain any personal benefit, but the individual's role or position to another person or organisation could influence their decision making within the Charity, for example, by lacking (or appearing to lack) objectivity. A connected person that can give rise to a conflict of loyalty could include, for example, a Trustee's employer, the organisation that appointed them as a Trustee or a Trustee's friends.

4.3 In this policy, "conflict of interest" includes a conflict of loyalty.

5. Interests that must be declared

5.1 Accordingly, Unipol asks Trustees to declare their interests including (but not limited to):

- An interest in any contract or proposed contract with the Charity
- Interests connected with appointing bodies or member organisations
- Membership of an accreditation scheme operated by Unipol such as the National Codes
- Any personal or organisational link to a party receiving from the Charity:
  - Professional or other fees including interest payments on money lent
  - Rent
  - Goods or services
  - Any benefit which may fall within the permitted exceptions listed under Article 7 of the Articles of Association. It should be noted that the Articles of Association prohibit Trustees from receiving any remuneration except in limited circumstances.

5.2 Trustees are also asked to declare any gifts or hospitality offered and received in connection with their role in the Charity as soon as this occurs.

6. Process for making declarations

6.1 Declarations and changes to declarations are made by the individual, not directed by the Charity. A Trustee needs to consider their own circumstances and has a responsibility to declare immediately when a new interest arises.

6.2 Interests should be declared:

- During the nomination and recruitment process for Trustees and upon appointment;
- Whenever a Trustee moves to a new role or responsibilities change;
- Whenever a Trustees' circumstances change and a new interest arises;
- At the start of every board and committee meeting in relation to the agenda items scheduled;

- Annually.

6.3 A declaration of interests form is contained in appendix 1, listing the types of interest Trustees should declare. To be effective, the declaration of interests needs to be updated at least annually, and as and when any changes occur.

6.4 If Trustees are not sure what to declare, or whether/when a declaration needs to be updated, they should err on the side of caution and make a declaration at the earliest opportunity – this should be as soon as the new item or matter is raised, not just when arrangements are to be concluded. If a Trustee would like to discuss this issue, please contact the Company Secretary for confidential guidance.

6.5 During the nomination or recruitment process for new Trustees, individuals will be asked to consider and identify if they have any potential conflicts of interests, in order that this can be considered as part of appointment process.

6.6 As a standing Board agenda item, at the start of each meeting, Trustees are asked to declare any perceived conflict of interest on any matters to be considered at that Board meeting.

6.7 The register of interests will be maintained by the Company Secretary and will be accessible by all Trustees upon request and reported to the Board annually. An example is included at appendix 2.

7. Removing or managing conflicts

7.1 Trustees must not allow conflicts to affect decisions. A Trustee must always put the interests of the Charity first and must not act in a way that benefits a third party (including a nominating institution) at the expense of the Charity. If a conflict of interest arises due to Unipol contracting with one of its Members or agreeing upon their level of subscription, Trustees must not act upon the instructions of their nominating bodies if they believe this conflicts with the best interests of the Charity. If a conflict is significant, the nominated Trustee should withdraw from discussions and decision-making on the matter.

7.2 As a minimum, the Trustee affected by the conflict of interest should:

- declare the conflict of interest
- leave the relevant discussion
- not take part in the decision giving rise to the conflict
- not be counted in the quorum for the meeting.

7.3 For a serious conflict of interest, consideration should be given to whether the conflict can by removed either by not going ahead with the proposal or by the Trustee resigning. Where conflicts of interest are complex or hard to manage, the Board can take legal advice or seek guidance from the Charity Commission before making a decision.

7.4 The Company Secretary should take special care to ensure that minutes or other documents relating to the item presenting a conflict are appropriately redacted for the person facing the conflict. A balance needs to be made to ensure that the person still receives sufficient information about the activities of the Charity generally without disclosing such sensitive information that could place the individual in an untenable position.

7.5 There is a separate policy for Trustees as Tenants which considers situations where Trustees are directly involved in decisions that affect the tenancy service they receive. There are situations where Trustees may participate in discussions from which they could indirectly benefit, for example where the benefits are universal to all users, or where the Trustee's benefit is minimal. This action will be agreed by the Chair and minuted accordingly.

7.6 The Board is keen to develop a culture where everyone is encouraged to recognise and discuss conflicts of interest. If a Trustee fails to declare an interest that is known to by the Company Secretary, the Chair of the Board or another Trustee, they should be encouraged to do so either during the meeting concerned or in confidence to the Chair of the relevant meeting or committee, or with the Company Secretary.

8. Recording conflicts of interest declarations

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

- the nature and extent of the conflict;
- when the conflict was first declared;
- an outline of the discussion; and
- the actions taken to manage the conflict.

8.2 Where a Trustee benefits from a decision of the Board, this will be reported in the annual report and accounts in accordance with the current Charities SORP.

8.3 All payments or benefits in kind to Trustees will be reported in the charity's accounts and annual report, with amounts for each Trustee listed for the year in question.

9. Data protection and confidentiality

9.1 The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2018. 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.

(Appendix 1)

Unipol Student Homes Trustee Declaration of Interests

I _____of have set out below my interests in accordance with the Charity's conflicts of interest policy.

Category	**Please give details of the interest and whether it applies to yourself or, where appropriate a connected persons***	**Date interest first began**
Current employment or self-employment/consultancy and any previous employment or self-employment in which you continue to have a financial interest.		
Appointments or relationships (voluntary or otherwise) e.g. Trusteeships, directorships, consultancies, local authority membership, public appointments, tribunals or another organisation etc. Please state whether roles are executive or non-executive roles.		
Investments in companies, partnerships and other forms of business, major shareholdings [a stake in excess of £50K or more than 1% of the total shares] and beneficial interests.		
Gifts or hospitality offered to you by external bodies in connection with your role at Unipol and whether these were declined or accepted in the last 12 months.		
Any contractual relationship with the Charity (current and/or in the past 12 months)		
Any connection to a user of Unipol's services.		
Any connection with a member or applicant to the ANUK/Unipol National Codes		
Any other conflicts that are not covered by the above.		

Notes

- Please enter 'NONE' when you have a nil return against any individual question.
- Please state whether interests are 'personal' or 'connected person'. If the latter, please also indicate the nature of the relationship.
- Please clearly state the date (including the year) the interest first commenced.

* A connected person is a person or organisation that is connected to a Trustee. In broad terms this includes:

- a Trustee's spouse or civil partner or any person living with the person completing the declaration form
- a Trustee's immediate family and related parties including child, stepchild, parent, grandchild, grandparent, brother, sister.
- a Trustee's business partner
- businesses where a Trustee has an interest through ownership or influence
- a Trustee's friends

If there is insufficient space within any of the sections of this form, please continue on a separate sheet and sign and date that separate sheet.

Declaration
To the best of my knowledge, the above information is complete and correct.

I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis.

I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

I understand that the information provided will be held in accordance with Unipol's privacy

policy. Signed:
Position:
Date:

Annex 2
Specimen register of interests for charity Trustees

Name of Trustee	**Description of interest**	**Does the interest relate to the Trustee or a person closely connected to the Trustee? Describe.**	**Date the interest was first declared**	**Is the interest still current**
Ms A Smith	Joint owner of catering company Member of the local authority	Trustee, other joint owner is the Trustee's daughter. Trustee		
Mr. A. Wright	Employee of ABC charity with similar aims and objectives working in the same area	Trustee		
Miss. R. Clifford	Was bought lunch to value of £40 by representative of a cleaning company	Trustee		