



Conflict of Interest Policy February 2017

1.0 Policy Statement

- 1.1 The University of Lincoln has strong, highly ethical values. The Union is therefore committed to upholding and promoting the highest standards of behaviour and to preventing, identifying and managing conflict of interests.
- 1.2 Trustees, staff and volunteers are expected to act with the highest standards of integrity in all dealings relating to University of Lincoln Students' Union. The trustees and senior managers in particular are expected to lead by example in ensuring that the highest levels of behaviour are adopted. The trustees owe a duty of loyalty to the charity and must always act in its interests. Trustees and staff must not use their office or employment for personal gain and should act at all times in good faith and in the interests of University of Lincoln Students' Union.
- 1.3 On occasion, conflicts of interest (whether potential, actual, or potentially may be perceived) may arise in the course of, or relating to, the Union's activities and those of its trustees, staff and volunteers. All University of Lincoln Students' Union trustees, staff and volunteers are required to recognise and disclose activities that might give rise to conflicts of interest, or the perception of conflicts, and to ensure that such conflicts are seen to be properly managed or avoided.
- 1.4 If conflicts of interest are properly managed, activities can often proceed whilst at the same time upholding the person's obligations to the Union, meeting regulatory and other external requirements and protecting the integrity and reputation of the Union. By contrast, conflicts which are not managed effectively, or where the conflict of interest cannot be appropriately resolved, may cause serious damage to the reputation of the Union and of the individuals concerned. It is therefore the Union's policy to ensure that when conflicts or perceived conflicts of interest arise they are acknowledged, disclosed, and properly managed.

1.5 There are legal requirements and consequences specifically upon trustees of charities, and a regulatory framework administered by the Charity Commission, to which regulatory framework University of Lincoln Students' Union is subject as a registered charity. Trustees are also bound by any and all provisions within University of Lincoln Students' Union's Constitution relating to conflicts of interest.

2.0 Aim and Scope of the Policy

2.1 The aim of this Policy is to give guidance on the legal requirements and to set out University of Lincoln Students' Union's policy in relation to conflicts of interest, and to assist trustees, staff and volunteers to identify, disclose and manage any real, perceived or potential conflicts of interest in the performance of their duties, and to ensure their actions are consistent with this Policy.

2.2 This Policy applies to all trustees, staff and volunteers of University of Lincoln Students' Union, and directors, committee members, volunteers and staff of Lincoln Students' Union Trading Limited and Students' Union Management System Ltd.

3.0 What is a Conflict of Interest?

3.1 A conflict of interest is any situation in which a trustee, staff or volunteer's personal interests or loyalties, or the interests of a person or organisation connected to the University of Lincoln Students' Union person, such as a family member or organisation in which the University of Lincoln Students' Union person has an interest, could, or could be perceived to, prevent the person from making a decision only in the best interests of University of Lincoln Students' Union, or where the conflict could, or could be perceived, to compromise the obligations they owe to University of Lincoln Students' Union.

3.2 Even the perception that there is a conflict of interest can damage the charity. Where the perception is not accurate because there is no conflict of interest, the trustees should always be able to respond appropriately to the situation by managing the risks to the charity and being prepared to explain how they have made their decisions only in the best interests of the charity.

3.3 Conflicts of interest usually arise where either:

- there is a potential financial or measurable benefit directly to a trustee, staff or volunteer, or indirectly through a connected person, or
- a trustee, staff, or volunteer's duty to the charity may compete with a duty or loyalty they owe to another organisation or person

3.4 All those covered by this Policy are required to recognise and disclose when there is a proposed transaction between the charity and the trustee, staff or volunteer, or with a person or organisation connected to them, that might give rise to a conflict of interest or the perception of a conflict, and to ensure that such conflicts are seen to be properly managed or avoided.

4.0 How Conflicts of Interest will be handled

- 4.1 Any conflict between the interests of the charity and the interests of a person covered by this Policy, or person connected with him or her, and any conflict between the loyalty owed to the charity and the duty of loyalty the person or connected person may have to any other person or organisation must be handled using the following steps:-
- **IDENTIFY** conflicts of interest
 - Everyone covered by this Policy each have an individual personal responsibility to declare conflicts of interest which affect them
 - strong systems must be in place so that conflicts of interest can be identified
 - **PREVENT** the conflict of interest from affecting the decision
 - Decisions must be made only in the best interests of the charity. This means the issue of the conflict of interest must be managed so that any potential effect on decision making is eliminated. How this is done will depend on the circumstances. In cases of serious conflicts of interest it may mean a decision being made to remove the conflict by:
 - not pursuing a course of action or
 - proceeding with the issue in a different way so that a conflict of interest does not arise or
 - not appointing a particular trustee or securing a trustee resignation
 - **MANAGE** the conflict of interest
 - Where a decision is made to manage rather than remove the conflict of interest the following procedures must be applied.
 - any specific requirements in the law or the charity's governing document which deal with conflicts of interest and how they should be managed must be followed (as well as being a requirement of this policy, this is also a legal requirement)
 - conflicted individuals declare their interest at an early stage and, in most cases, withdraw from relevant meetings, discussions, decision making and votes
 - the trustees may, in exceptional cases, need to seek the authority of the Charity Commission where the conflict of interest is so acute or extensive that the measures above alone will not allow the trustees to demonstrate that they have acted in the best interests of the charity
 - **AUTHORISE** (or not) the conflict of interest
 - Where a decision is made to manage rather than remove the conflict of interest, it must be properly authorised (as well as being a requirement of this policy, this is also a legal requirement in the case of a trustee conflict of interest)

- must follow any conditions attached to the authority which say how the conflict of interest should be handled (as well as being a requirement of this policy, this is also a legal requirement in the case of a trustee conflict of interest)
- RECORD conflicts of interest
 - Conflicts of interest must be formally recorded, including details of how they have been handled
 - Any conflict of interest involving a trustee benefit must be disclosed in the Union's annual financial statements (as well as being a requirement of this policy, this is also a legal requirement)

5.0 How do I identify a conflict of interest?

- 5.1 Individual trustees and the Board of Trustees must be able to identify any conflicts of interest at an early stage. The law says that each individual trustee must avoid putting themselves in a position where their duty to act only in the best interests of the charity could conflict with any personal interest they may have. In practice this means that:
- individual trustees who fail to identify and declare any conflicts of interest will fail to comply with their personal legal responsibility to avoid conflicts of interest and act only in the best interests of the charity
 - the Board of Trustees must ensure that any conflicts of interest do not prevent them from making a decision only in the best interests of the charity

5.2 Conflicts of interest may come in a number of different forms:

- Direct financial gain or benefit to the trustee, staff or volunteer, such as [the list is not intended to cover all actual or potential conflicts]:-
 - Payment to a trustee, staff or volunteer, or a person or company closely connected to them, for providing a service to the charity; this covers anything that would be regarded as a service and includes legal, accountancy or consultancy services through to painting or decorating the charity's premises, or any other maintenance work, or any other types of service provision
 - the award of a contract to another organisation in which the trustee, staff or volunteer, or a connected person, has an interest and from which the person will receive a financial benefit
 - sale, loan or lease of charity assets to a trustee, staff or volunteer
 - positions of office or significant influence held within another organisation
 - shareholdings, investments or other business interests held by the individual or a family member
 - the employment of a trustee in a separate post within the charity, even when the trustee has resigned in order to take up the employment
 - receipt of gifts or preferential rates

- Indirect financial gain or benefit to the trustee, staff or volunteer, such as [the list is not intended to cover all actual or potential conflicts]:-
 - employment by the charity of a spouse or partner of a trustee or staff [by being involved in the appointment or their spouse or partner to a paid position within the charity, the person themselves could be seen to benefit, at least indirectly, from the appointment and the resulting payment]
 - non-financial gain, such as when a user of the charity's services is also a trustee
 - conflict of loyalties, such as where a family member or friend of a trustee, staff or volunteer is employed by the charity or where a personal relationship exists between staff or between a trustee, staff or volunteer which could lead to a suspicion of favouritism or preferential treatment; where such personal relationships exist, they should be declared in the same way as relationships with external organisations. Declarations of such relationships will need to be handled in a sensitive manner and issues of confidentiality will need to be considered
 - any interests of which he or she is aware that persons connected with him or her have in organisations where it is reasonably likely that a conflict could arise, such as organisations operating in the same or similar fields as, or which might fund, or provide goods or services to, University of Lincoln Students' Union, or organisations which University of Lincoln Students' Union might fund, or to which University of Lincoln Students' Union might provide goods or services

6.0 How do I declare a conflict of interest?

- 6.1 Each trustee, staff or volunteer is individually responsible for disclosing any potential or actual conflicts of interest that may impact on their roles and responsibilities at University of Lincoln Students' Union. When deciding on such matters, consideration must also be given to how things could appear to others and, in all cases, individuals should err on the side of caution, declaring an interest if there is any possibility that a conflict of interest may exist.
- 6.2 All trustees, staff and volunteers MUST declare any actual or potential conflicts of interest of which they are aware, as soon as they arise.
- 6.3 Declarations should be made using the Declaration of Interests (DOI) form. All sections of the form must be completed, and as much detail as possible should be given in the interest of transparency and assessing how the conflict can be managed and whether it should be authorised or not authorised.
- 6.4 Where a conflict of interest has been declared, the following process will be followed:-
 - where the conflict of interest relates to a trustee or a Director of a Ltd company, the declared conflict will be reported to the full Board of Trustees by the Chief Executive [where the conflict of interest relates to the Chief

Executive, another trustee shall replace the conflicted trustee], and the report will either:-

- o propose a strategy for managing the conflict of interest, which shall comply with any and all requirements of the Union's Financial Procedures, and authorising or not authorising the conflict, and the Board will formally approve (or not) the proposed strategy to manage the conflict, or decide the conflict must be removed
 - o in instances where the conflict of interest is highly significant, request the Board to discuss how the conflict should be handled if approved, or whether the conflict should be removed, and the Board will formally approve the resulting decision
 - o if the conflict relates to a trustee, the proposed strategy to manage the conflict of interest may include: -
 - o removal of decision making and voting rights from a trustee on the issue to which the conflict of interest relates
 - o authorisation of the conflict by the Charity Commission
- where the conflict relates to a staff member (who is not a Director) or a volunteer, and the annual potential financial benefit involved in the conflict is estimated to be less than £1,000 per annum, the Deputy Chief Executive, taking advice from others where considered appropriate, will formulate the strategy for managing the conflict of interest, and authorise or not authorise the conflict
 - where the conflict relates to a staff member (who is not a Director) or a volunteer, and the annual potential financial benefit involved in the conflict is estimated to be more than £1,000 per annum, the Deputy Chief Executive, taking advice from others where considered appropriate, will propose a strategy for managing the conflict of interest, and The Trustee Board will formally approve (or not) the proposed strategy to manage the conflict, or decide the conflict must be removed
- 6.5 In any of the approval processes detailed in section 6.4, measures to manage the conflict may involve: -
- the conflict of interest and any associated proposed transactions not being allowed to proceed [removal of the conflict]
 - restricting the individual from participating in part of the activity (e.g. taking part in deliberations on the particular issue or issues which are the subject of the conflict of interest)
 - removing the individual from involvement in the issue altogether where the interest is substantial and partial restriction may not be appropriate
 - requesting that the trustee, staff or volunteer relinquish their personal interest if it is considered that the personal interest is outweighed by their duty to University of Lincoln Students' Union
 - if the conflict relates to a trustee, removal of decision making and voting rights from a trustee on the issue to which the conflict of interest relates
 - if the conflict relates to a trustee, the Board of Trustees may, exceptionally, need to seek the authority of the Charity Commission where the conflict of interest is so acute or extensive that following the above or other options will

not allow the trustees to demonstrate that they have acted in the best interests of the charity

- 6.6 Trustees must consider the issue of the conflict of interest so that any potential effect on decision making is eliminated. This means that in cases of serious conflicts of interest they may decide that removing the conflict of interest is the most effective way of preventing it from affecting their decision making and demonstrating that they have acted only in the best interests of the charity.

Serious conflicts of interest include, but are not limited to, those which: -

- are so acute or extensive that the trustees are unable to make their decisions in the best interests of the charity, or could be seen to be unable to do so
- are present in significant or high risk decisions of the trustees
- mean that effective decision making is regularly undermined or cannot be managed in accordance with the required or best practice approach
- are associated with inappropriate trustee benefit

In practice removing the conflict of interest is likely to mean one or more of: -

- not pursuing the course of action
- proceeding with the issue in a different way so that a conflict of interest does not arise; this might mean deciding not to consider using a trustee's company to do some work for the charity if this would mean that the number of payments to trustees, although authorised, is at risk of introducing levels of conflict of interest which could be difficult to manage and to justify - it could, exceptionally, mean seeking the Charity Commission's prior authority to a continuing and widespread conflict of interest
- securing the resignation of a trustee affected by a conflict of interests
- not making trustee appointments which will introduce a conflict of interests

- 6.7 If the decision under any of the approval processes detailed in section 6.4 is that it is possible to successfully manage the actual or potential conflict of interest by the proposed strategy which has been approved, and that therefore the proposed transactions or activities in relation to the conflict should proceed, the approval given may take any of the following forms: -

- if the conflict relates to a supplier from which the person declaring the conflict, or a person connected to them, will receive a financial benefit, and that supplier is a preferred supplier under the Union's procurement procedures [which include consideration of any potential conflict implications and approval by the Board of Trustees of the process to manage the conflict, before appointment as a preferred supplier]:
 - approval without limitation may be given or
 - approval up to a total amount over any period of time or
 - approval up to a total annual amount.

If the value of the financial transactions are likely to exceed any limitation within the approval, further Board approval must be sought before the approved limit is exceeded

- if the supplier is not an existing preferred supplier, approval for transactions in relation to the managed conflict may be given up to a total amount over any period of time, or an amount per annum, above which limitations further approval must be sought from the Board of Trustees before the approved limit is likely to be exceeded
- if the conflict of interest relates to a matter which is not one of purchasing from a supplier, the Board of Trustees will discuss and formally approve the process by which the conflict will be managed

7.0 Register of Interests

- 7.1 A Register of Interests will be maintained by the Clerk to the Board, recording interests declared by trustees, Directors, and senior managers.
- 7.2 As part of the pre-appointment recruitment process, a potential trustee, Director or senior manager must complete a Declaration of Interests (DOI) form, which will be reviewed as part of the recruitment process, before a decision to appoint is made. Clerk to the Board is responsible for issuing the form and ensuring it is returned within the required timeframe to allow review as part of the recruitment process.
- 7.3 If a conflict of interest is declared by any candidate, the declared conflict of interest must follow the approval process for a trustee or Director, or in the case of a senior manager the approval process for a staff member other than Director Group, as detailed in section 6.4 above. This process must be completed and approval must be given before any offer of trusteeship or employment is made to the prospective candidate.
- 7.4 Clerk to the Board will ensure that the Register of Interests is updated annually in August, by requiring completion of the DOI form by all the relevant people defined in 7.1 above, whether or not they have previously declared an Interest.
- 7.5 All DOI forms, whether arising from a new starter, from the annual update of the Register, or from an interest declared to the Register of Interest by an individual at another time as it arises, if not the subject of an existing, current, approval, will be submitted by Clerk to the Board through the relevant approval process required in section 6.4 above.
- 7.6 The annual update of the Register of Interests in no way obviates trustees, members of Director Group or senior managers from their responsibility to declare actual or potential conflicts of interest as they arise.

8.0 Conduct of Meetings involving a Conflict of Interest

- 8.1 Each Board of Trustees, or Committee of the Board, meeting must have a standard agenda item at the beginning of each meeting for trustees or committee members to declare any actual or potential conflicts of interest.
- 8.2 Whenever a matter is to be discussed or decided at a meeting in which a trustee actually or potentially in respect of that matter has a conflict of

interest, or might be perceived by a reasonable person to have a conflict, with the interests of University of Lincoln Students' Union, the person MUST:-

- declare his or her interest to the trustees at the start of the meeting, in advance of any discussion of the item taking place; if a trustee is uncertain whether he or she is conflicted, he or she should err on the side of openness, declaring the issue and discussing the potential conflict with the other trustees
- remain only for such part of the meeting as is necessary to inform the debate
- not be present at any vote and have no vote on the matter
- not be counted in the quorum for that part of the meeting
- if any question arises as to whether a trustee has a conflict of interest, the question shall be decided by a majority decision of the other trustees
- if a trustee is aware of an undeclared conflict of interest affecting another trustee, they should notify the other trustees or the Chair

8.3 Minutes of the meetings of trustees and any committees at which conflicts of interest arise should record:-

- whether the conflict of interest was declared in advance
- the nature of the conflict
- the level of participation, or withdrawal, of the affected trustee with respect to consideration of the matter
- details of the discussion in relation to the conflict
- what is determined in relation to the conflict, and the outcome of any vote taken regarding the conflict
- any limitation agreed on the trustee's ability to act with respect to the conflict
- any limitation agreed on the value or nature of prospective transactions in relation to the conflict
- details of how the trustees took the decision in the best interests of the charity

8.4 Meetings other than trustee meetings, involving trustees, staff or volunteers, should follow the same principles as above when a conflict of interest is declared.

9.0 What are the consequences for trustees of not acting properly when there is a conflict of interest?

9.1 Failure to act properly where there is a conflict of interest is a breach of the trustees' legal responsibilities, and can have serious consequences for the affected trustee, the charity, and public trust and confidence in charities generally. Where a trustee or trustees have acted outside the terms of the charity's governing document (in University of Lincoln Students' Union's case the Constitution) or the law, their decision may not be valid and it could be challenged by the Charity Commission or by an interested party or beneficiary of the charity. In some circumstances the transaction to which the conflict of interest relates may be capable of being invalidated by the courts

- or the Charity Commission, or, in the worst case, might be ruled void [having no legal basis] from its start.
- 9.2 Where they have not acted properly, trustees may have to repay any sums paid by the charity, whether they result from an unauthorised trustee benefit or another breach of duty. This can be the case, even where the charity has benefited from the arrangement. If the charity has also suffered a loss, the trustees may have to make good such loss to the charity.
- 9.3 Where a case involving a conflict of interest presents a serious risk to the charity or to public confidence in charities generally, or where it seems that trustees have deliberately or negligently placed their own interests ahead of those of the charity and have, as a result, gained significant benefit at the expense of the charity, the Charity Commission will use their powers to:
- stop abuse, trustee misconduct and mismanagement; this includes where the trustees fail to fully take steps to resolve the issues or are incapable of doing so
 - intervene in a charity's affairs and take steps to recover any sums lost to charity, where the trustees are unable or unwilling to do so, and the amount involved is significant
 - If evidence is found, or suspected, of criminal activity, the Charity Commission will refer the matter to the police and other relevant agencies, as well as invoking their own powers of intervention
- 9.4 In addition to the legal and regulatory consequences, trustees also need to be aware of the significant negative effects that a conflict of interest can have on the charity's reputation. If those outside the trustee body have the impression that the trustees have acted in their own interests rather than those of the charity, this could damage the reputation of both the charity and the trustees. This could affect the charity's fundraising and the confidence of staff, volunteers and beneficiaries in the charity.

10.0 Prospective new trustees

- 10.1 Prospective trustees must be asked before they are appointed about other interests they hold, by completing a Declaration of Interests [DOI] form (Appendix 1) in order that an assessment can be made by University of Lincoln Students' Union about any potential conflicts of interests. Prospective new trustees must also specifically declare on the DOI form any conflicts of interest which exist in relation to University of Lincoln Students' Union, or any which they can foresee arising if they join University of Lincoln Students' Union.
- 10.2 If a new trustee's position is elected by University of Lincoln Students' Union's membership, such as elected student trustees, the membership must be made aware of any possible conflicts of interest involving the individuals standing for election, so that they can take this into account when voting. This is particularly important where personal interests may be significant enough to make it difficult for the individual concerned to make a full and rounded contribution to the decisions and discussions of the trustee board. The

Director of Membership Services, in liaison with the Head of Representation and Democracy, is responsible for ensuring declarations of any actual or potential conflicts of interest are made during the nomination process by all prospective new elected trustees, by their completion of a DOI form; the form must be completed by all candidates, including "nil returns", confirming they have no relevant interests, and therefore no potential conflicts of interest.

- 10.3 With regard to prospective external trustees and selected student trustees, the Chief Executive has responsibility to ensure that any actual or potential conflicts of interest are declared by all prospective new external trustees during the recruitment and selection process, by completion of a DOI form in Appendix 1.
- 10.4 Clerk to the Board will collate the DOI forms for all prospective trustees under sections 10.2 and section 10.3 above, and submit a copy to the person leading the recruitment process for that role.
- 10.5 The person leading recruitment for the role (usually the Chief Executive) will review the DOI forms for all prospective candidates, consulting with others as considered appropriate, and, if a conflict of interest has been declared, or it is considered that an interest that has been declared but for which no conflict is declared could, in fact, constitute an actual or potential conflict, the conflict of interest must be submitted for approval by the process detailed in section 6.4 above, and approved prior to any offer of the role being made to the candidate.

11.0 Implementation and Monitoring of the Conflict of Interest Policy

- 11.1 Clerk to the Board (for trustees), Deputy CEO/Head of HR (for staff) and the Employability and Volunteering Manager (for volunteers) will ensure that this policy is brought to the attention of trustees, staff and volunteers on a regular basis and as part of the induction procedure for all new trustees, staff or volunteers, and that individuals are made aware of their responsibilities under this Policy and the requirement to declare conflicts of interest.
- 11.2 A declaration of interest does not replace the need for individuals to declare relevant interests during the course of the business of a committee, or during day-to-day activity; any such interests, even if previously declared and approved, must be declared at each meeting.
- 11.3 The Union's Finance Committee will monitor the implementation of this policy and is responsible for advising the trustees of any further measures required to control the risk relating to conflict of interests.
- 11.4 All documentation (Declaration of Interest forms, emails, proposals, formal authorisations, copy of contract etc.) relating to conflicts of interest will be centralised with the Clerk to the Board, and retained in a readily accessible format.

- 11.5 Breaches of this policy, or failure to comply with the strategy for managing the conflict of Interest agreed and approved, may lead to disciplinary action against staff, including potentially gross misconduct, depending on the nature and severity of the breach, or other appropriate action against trustees as determined by the Board of Trustees, or appropriate action against volunteers.



Disqualification of Trusteeship- Guidance for Trustees and Senior Managers

In line with the Charities Act 2016, to ensure due diligence of good governance and protect the best interest of Charities, the Charity Commission has introduced a ruling for all Charities when appointing Trustees and throughout their term in office. Trustees will now be automatically disqualified from acting as a charity trustee should the Commission consider the individual to be unfit for trusteeship.

The Act extends this past Trustees to Senior Managers and as such this will also apply for the University of Lincoln Students' Union Senior Management Team. An individual who has been disqualified as a Trustee is not allowed to be in a Senior Management role in a Charity or actively involved in the management of a corporate charity trustee.

The following outlines the criteria for when disqualification may occur, one of the six conditions must apply for the Charity Commission to enact the process;

1. Someone has been cautioned for an offence against a charity or in the administration of a charity for which a conviction would bring automatic disqualification.
2. Someone has been convicted of an offence in another country that is against, or involves the administration of, a charity or similar body or if it had been committed here would bring automatic disqualification from acting as a trustee.
3. Someone has been found by HMRC not to be a 'fit and proper person' to be a manager of a body or trust.
4. They were the trustee, officer, agent or employee of a charity who was responsible for, contributed to or facilitated misconduct or mismanagement in a charity.
5. They were an officer or employee of a corporate trustee who was responsible for, contributed to or facilitated misconduct or mismanagement in a charity.
6. They have done something, whether or not in relation to a charity that is, or is likely to be, damaging to public trust and confidence in a charity or charities

As well as the six conditions, the number of criminal offences which can contribute to the automatic disqualification of an individual becoming a Trustee includes convictions for serious terrorism offences, money laundering or bribery.

In line with this, all appointed Trustees and the Senior Management Team of the University of Lincoln Students' Union must complete a Disclosure Barring Service (DBS) check which shall be reapplied for when commencing a new Terms of Office. Senior Managers should adhere to the DBS policy which covers all University of Lincoln Students' Union employees.

Individuals are also obligated to declare any such activity which reflects any of the six conditions as well as any criminal offences in line with the Code of Practice for all Trustees.



Declaration of Interests Form 2016/2017

I _____ (print name) have detailed my interests below in accordance with the Union's Declaration of Interest Policy.

You will be asked to complete a form on a yearly basis, but should your circumstances change at any time you should contact the Secretary to the Board of Trustees as soon as possible.

Category of interest	Please give details of relevant interests, whether it applies to yourself or a close family member or some other close personal connection
A. Existing employment and any previous employment in which you continue to have an interest.	
B. Appointments (including voluntary) such as directorships, trusteeships, local authority memberships etc.	
C. Membership of any professional bodies, pressure or special interest groups or mutual support organisations	
D. Significant or material shareholdings or interests in listed companies. (We are defining 'significant' as meaning 25% or more of the company equity; and 'material' as an investment which makes a personal difference to the circumstances of the owner	

<p>of the shareholding.)</p> <p>Investments in unlisted companies, partnerships and other forms of business should be disclosed.</p>	
<p>E. Gifts or hospitality of a value of more than £25 accepted by you in the last 12 months from external bodies or companies in relation to Union activities.</p>	
<p>F. Any contractual relationship with the Union or any of its subsidiaries.</p>	

Signed: Dated:

Transactions between the Union and Family members

I am not aware of any transactions during the financial year ended 30th June 2017 between the Union or its subsidiaries and a member of my close family (spouse, parents, children or siblings) over whom I may have had influence, or who may have had influence over me in respect of business activity with the Union and its subsidiaries.

Signed:

Date:

OR

I am aware of transactions during the financial year ended 30th June 2017 between the Union or its subsidiaries and a member of my close family (spouse, parents, children or siblings) over whom I may have had influence, or who may have had influence over me in respect of business activity with the Union and its subsidiaries and the details of these transactions were as follows:

- (a) the names of the transacting related parties;
- (b) the relationship between the parties;
- (c) a description of the transactions;
- (d) the amounts involved, stating nil value if appropriate;
- (e) any other elements of the transactions necessary for an understanding of the financial statements.

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Signed:

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Date:

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Law and Regulations (ISA 250)

Please indicate if you are aware of any potential breach of law/regulations which are relevant to the Union's business.

Please strike out the words as appropriate:

I am aware/not aware of any potential breaches of laws and regulations. This relates to items which could have a financial impact in excess of £50,000 on the financial statements for the year ended 30th June 2017.

Signed:

Date:

If you have stated that you are aware of any such potential breach, please give details below:

.....
.....

Fraud (ISA 240)

Please indicate whether you are aware of any actual or suspected frauds which are relevant to the Union.

Please strike out the words as appropriate:

I am aware/not aware of any actual or suspected frauds. This relates to items which could have a financial impact in excess of £50,000 on the financial statements for the year ended 30th June 2017.

Signed: Date:

If you have stated that you are aware of any such fraud, please give details below: