



POLICY

Conflict of Interest Policy

Directors, staff, practitioners and connected organisations

Organisation	Early Help Support CIC, trading as ANCHOR Inclusion® (Company no. 17322790)
Policy owner	The Board of Directors
Version	1.0
Effective date	24 September 2026
Next review	September 2027

1. Purpose

ANCHOR Inclusion is a community interest company. Its assets and income exist for the benefit of the community it serves: children with SEND and the adults around them. This policy explains how ANCHOR identifies, declares and manages conflicts of interest, so that every decision is made in the best interests of the CIC and can be shown to have been made that way.

A conflict of interest is not wrongdoing in itself. Small organisations often rely on the skills of the people who lead them. What matters is that conflicts are declared openly and managed properly.

2. Who this policy applies to

This policy applies to directors, employees, freelance trainers, practitioners on the ANCHOR practitioner register, volunteers and members of the CIC. It also applies to people and organisations connected to them (see section 4).

3. What is a conflict of interest?

A conflict of interest arises when a person's own interests, or their duty to someone else, could influence, or could reasonably appear to influence, a decision they make for ANCHOR. There are three kinds:

Financial	The person, or someone connected to them, could gain or lose money. For example, a director's company is being considered as a supplier.
Non-financial	The person could gain some other benefit, such as reputation, a role or influence.

Loyalty	The person also owes a duty to another organisation, such as a school, a funder or another company, whose interests may differ from ANCHOR's.
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A conflict can be actual, potential or perceived. All three must be declared.

4. Connected persons and organisations

A connected person includes a spouse or partner, a child, parent or sibling, and anyone living in the same household. A connected organisation is any company, charity or business in which a director or connected person is a director, shareholder, partner, employee or trustee.

Standing declarations: Inclusion Edtech Ltd and ANCHOR intellectual property

S Asha, Founder and director of the CIC, is also the director and sole shareholder of Inclusion Edtech Ltd, a private limited company. The CIC contracts Inclusion Edtech Ltd, under a written contract, to provide the ANCHOR app. At the date of this policy (version 1.0), no fees have been paid under that contract.

S Asha also personally owns the ANCHOR trade mark (UK00004397167) and the code of the ANCHOR app. The CIC uses both with her permission. That permission will be set out in a written licence, approved by directors with no interest in it, so that the CIC's right to use the ANCHOR name and app is secure.

These are standing declared interests. They are recorded in the register of interests and apply to every decision involving Inclusion Edtech Ltd, the ANCHOR trade mark or the ANCHOR app. In addition to the rest of this policy:

1. Every arrangement between the CIC and Inclusion Edtech Ltd, or between the CIC and the founder personally, is set out in a written agreement.
2. That agreement, and any fee or change to it, is approved only by directors who have no interest in it.
3. The terms must be at least as good for the CIC as terms it could obtain from an unconnected organisation. Where intellectual property is involved, the board will take independent advice on its value.
4. No asset of the CIC is transferred to Inclusion Edtech Ltd or the founder for less than its full value. This protects the CIC's asset lock under the Companies (Audit, Investigations and Community Enterprise) Act 2004 and the rules of the CIC Regulator.
5. The board reviews every arrangement with Inclusion Edtech Ltd and the founder at least once a year and records the review in the minutes.
6. Payments between the two companies are reported in the CIC's annual community interest report (form CIC34).

5. Register of interests

- Every director completes a declaration of interests (Appendix A) on appointment and every year after that.
- Directors update their declaration as soon as their interests change, without waiting for the next meeting.
- The board keeps a register of interests (Appendix B). The founder holds it until a Chair is appointed. Every director can see it at any time, and it is available to funders on request.
- "Declarations of interest" is a standing item at the start of every board meeting.

6. How conflicts are managed at meetings

1. A person with a conflict declares it as soon as they are aware of it, and the declaration is recorded in the minutes.
2. They may answer questions if the other directors ask them to, and then leave the discussion.
3. They do not vote, and they are not counted in the quorum for that decision, unless the CIC's articles of association say otherwise.
4. The remaining directors decide whether the arrangement is in the CIC's best interests, and record their reasons.

If fewer than two directors are free of the conflict, the decision is not taken. It waits until enough independent directors are in post, or the board takes independent professional advice and records it. This is one reason ANCHOR is appointing non-executive directors.

7. Directors undertaking paid work for the CIC

ANCHOR directors are not paid for acting as directors. A director may be paid separately, as an employee or a self-employed contractor, for work beyond their director duties where they have the right skills and experience. For example, the founder is ANCHOR's lead trainer and assessor.

Where a director is considered for paid work:

- the director declares the conflict and takes no part in the decision about their appointment or pay;
- the decision is made by the other directors, and where possible by at least two directors who are unrelated to the person and have no conflict;
- the fee must be reasonable and represent good value, especially where grant or public money is used;
- the board records in the minutes why the director was appointed and how the fee was set; and
- the board checks that anyone described as self-employed meets HMRC's rules for self-employment.

The CIC must be able to show that a director was appointed for their skills and value, not because they are a director.

8. Recruitment and value for money

Not every contract needs to be advertised. Where a funder, procurement rules or the value of the contract require it, the role is advertised openly or competitive quotes are obtained, and a director may need to apply like any other candidate. The board considers relevant skills and experience, the quality of service, the market rate and value for any public or grant funding used.

9. Grant-funded work

Before a director or connected person is paid from grant funding, the board checks the funder's terms and conditions. Some funders require prior approval, competitive recruitment or extra evidence. A funder's conditions always take priority over this policy.

10. Gifts and hospitality

- Any gift or hospitality worth more than £50 is declared to the board and recorded in the register.
- No one accepts a gift or hospitality from a school, supplier or funder while a decision affecting them is being made.
- Practitioners follow the gift rules in the ANCHOR Safeguarding Policy.

11. Practitioners on the ANCHOR register

- Practitioners declare any personal or family relationship with a family or school they are booked to work with. The DSL decides whether the booking can go ahead.
- Practitioners do not take work from ANCHOR families outside the ANCHOR platform.
- Practitioners do not use their ANCHOR status to promote other paid services to ANCHOR families.

12. Records

Where a conflict affects a decision, ANCHOR keeps a clear record, including the declaration, the work or arrangement involved, the agreed fee or terms, evidence of value for money, any quotes or recruitment process, confirmation that the conflicted person took no part in the decision, and the board's decision and reasons. This gives a clear audit trail for funders, the CIC Regulator and ANCHOR's members.

13. Breaches of this policy

If a conflict was not declared, the board reviews the decision it affected and may cancel or renegotiate it. A failure to declare a conflict may lead to removal from a role, from the practitioner register or, for a director, to action under the CIC's articles of association.

14. Review

The board reviews this policy every year, and sooner if ANCHOR's activities, funding or connected organisations change. Questions about a possible conflict go to the Chair, once appointed, or to any director who is not conflicted.

Approval

Approved by the Board on	24 September 2026
Signed (director)	
Print name	S Asha, Founder and Director
Next review date	September 2027

Appendix A: Declaration of interests

To be completed by each director on appointment, every year, and whenever their interests change.

Name	
Role at ANCHOR	
Other directorships, partnerships or shareholdings	
Paid employment or self-employment	
Trustee or governor roles	
Relationships with schools, local authorities, funders or suppliers ANCHOR works with	
Interests of connected persons	
Gifts or hospitality received in the last 12 months	

I confirm this declaration is complete and I will update it as soon as my interests change.

Signed: _____ Date: _____

Appendix B: Register of interests

Name	Interest declared	Type	Date declared	How it is managed
S Asha	Inclusion Edtech Ltd: director and sole shareholder. The CIC contracts the company for app services.	Financial	24 Sept 2026	Standing declaration. Section 4 applies to all dealings.
S Asha	Personal owner of the ANCHOR trade mark (UK00004397167) and the ANCHOR app code, both used by the CIC.	Financial	24 Sept 2026	Standing declaration. Written licence to the CIC to be approved by non-conflicted directors.



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Trading name of Early Help Support CIC.

Registered in England and Wales, Company No. 17322790

ICO Registration No. ZC037104

UK registered trade mark UK00004397167 (classes 41 and 42)

Registered office, not a service venue:

60 Tottenham Court Road, Office 1408,

London W1T 2EW, United Kingdom