Group Policy Document

CONFLICTS OF INTEREST POLICY

Summary

The purpose of this policy is to establish clear procedures for declaring and managing conflicts of interest; ensure that decisions are made objectively and free from improper influence; and ensure compliance with regulatory requirements relating to conflicts of interest, related parties and related party transactions.

If you are unsure about the validity of the content of this policy, please refer to the Policy Owner

Please Note: This policy is applicable to Members, Trustees, Local Governors, Committee members, the Chief Executive Officer, Executive Leaders and Employees involved in recruitment, procurement, financial management or decision-making.

Policy owner	Audit & Risk Committee
Policy holder	Lead Governance Professional
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Group Policy Area	Governance

Approved by

Consultation Group	Audit & Risk Committee
Approval Committee	Board of Trustees
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Review Date	October 2029
Current Version Number	V2

Version Control

Control No.	Change summary	Consultation Group	Effective date
V2	Complete rewrite of existing policy (V1) to make it more concise and aligned to the latest Academy Trust Handbook		13/10/2026

CONFLICTS OF INTEREST POLICY

1. Policy Statement

The Trust is committed to the highest standards of integrity, openness, accountability and stewardship in all of its activities.

This policy establishes the framework by which actual, potential and perceived conflicts of interest are identified, declared, recorded and managed to ensure that decisions are made solely in the best interests of the Trust and its beneficiaries.

The policy supports the requirements of the current Academy Trust Handbook, the principles of charity governance, and the Seven Principles of Public Life.

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2. Purpose

The purpose of this policy is to:

- Establish clear procedures for declaring and managing conflicts of interest.
- Ensure that decisions are made objectively and free from improper influence.
- Ensure compliance with regulatory requirements relating to conflicts of interest, related parties and related party transactions.
- Promote transparency and public confidence in governance and financial management.
- Protect the integrity and reputation of the Trust.

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3. Scope

This policy applies to:

- Members
- Trustees
- Local Governors
- Committee Members
- The Chief Executive Officer
- Executive Leaders (Executive Leadership Team, Executive Principals, Principals, Academy Leadership Teams)
- Budget-holding employees involved in recruitment, procurement, financial management or decision-making

These individuals are referred to throughout this policy as **Relevant Persons**.

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4. Principles

All Relevant Persons must:

- Act solely in the interests of the Trust.

- Exercise independent judgement.
- Avoid placing themselves under any obligation that could influence their role.
- Declare actual, potential or perceived conflicts promptly.
- Be transparent regarding personal, financial and professional interests.
- Refrain from participating in decisions where their interests conflict with those of the Trust.

Where uncertainty exists, the interest should be declared.

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5. Definition of a Conflict of Interest

A conflict of interest arises where a Relevant Person's personal, professional, financial or other interests could:

- influence their judgement;
- affect their ability to act solely in the Trust's interests; or
- reasonably be perceived by others as influencing their decision-making.

Conflicts may also arise from duties of loyalty owed to another organisation, body or individual.

Conflicts may be:

Actual

A direct conflict currently exists.

Potential

A conflict may arise in the future.

Perceived

A reasonable person could consider that a conflict exists even where no actual conflict arises.

Conflicts may arise directly or through a connected person.

Connected persons include:

- spouses, partners or close family members;
- business partners;
- employers or employees;
- companies in which the individual has an interest;
- organisations to which the individual belongs; and
- any person or organisation whose interests may reasonably be associated with those of the Relevant Person.

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6. Register of Interests

The Trust shall maintain a Register of Interests.

The Register shall be maintained by the Lead Governance Professional and reviewed regularly to ensure accuracy and completeness.

All Relevant Persons must:

- complete a Declaration of Business, Pecuniary and Other Relevant Interests upon appointment (see Appendix A);
- complete an annual declaration;

- provide a nil declaration where no interests exist;
- promptly notify the Lead Governance Professional of any changes during the year; and
- confirm compliance with this policy annually.

The Board shall receive assurance that the Register remains complete and up to date.
The Trust shall publish interests on its website where required by legislation, funding agreements or the Academy Trust Handbook.

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7. Declaration of Interests at Meetings

The maintenance of the Register of Interests does not remove the obligation to declare interests during meetings.
Relevant Persons must declare:

- any interest recorded in the Register which is relevant to a matter under consideration;
- any newly arising interest; and
- any actual, potential or perceived conflict relating to an agenda item.

Declarations should be made:

- at the beginning of meetings; and
- immediately upon recognising the conflict if it becomes apparent later in the meeting.

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8. Managing Conflicts of Interest

The Chair shall determine how any conflict should be managed, taking account of:

- the nature of the interest;
- the degree of conflict;
- legal and regulatory requirements;
- the Trust's Articles of Association; and
- the need to maintain public confidence in decision-making.

A conflicted individual may be required to:

- remain present after declaring the interest;
- participate in discussion but not vote;
- withdraw from voting only;
- withdraw from both discussion and voting; or
- leave the meeting for the relevant item.

A conflicted individual must not seek to influence any decision from which they have been excluded.
Where required, the individual shall not be counted towards quorum for that item.

Nothing within this policy overrides the requirements of the Articles of Association. Where any inconsistency arises, the Articles shall take precedence.

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9. Recruitment, Procurement and Financial Decisions

Relevant Persons involved in recruitment, procurement, contract management or financial decision-making must declare any interest that could affect, or reasonably appear to affect, their objectivity.
Individuals with a conflict must not:

- participate in supplier selection;
- evaluate tenders where they have an interest;
- influence recruitment decisions involving connected persons; or
- approve expenditure from which they or a connected person may benefit.

All decisions must be capable of demonstrating fairness, transparency and value for money.

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10. Related Parties and Related Party Transactions

The Trust shall identify and manage related party relationships and related party transactions in accordance with the requirements of the Academy Trust Handbook in force at the relevant time and any associated Department for Education guidance.
This includes reporting and seeking approval for related party transactions where required.

The Trust shall ensure that:

- transactions are conducted openly and transparently;
- decisions are demonstrably in the Trust's best interests;
- appropriate procurement procedures are followed;
- value for money is secured;
- required declarations are made;
- any approvals or reporting requirements are met before commitments are entered into; and
- conflicted individuals play no part in considering, approving or managing the transaction.

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11. Gifts, Hospitality and Benefits

Relevant Persons must not accept gifts, hospitality or other benefits that could:

- influence decision-making;
- compromise independence;
- create an actual conflict; or
- create a perception of bias.

Any gifts or hospitality must be declared and recorded in accordance with Trust procedures.

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12. Use of Information and Position

Relevant Persons must not:

- use confidential information for personal benefit;
- use their position for personal advantage;
- secure benefits for connected persons through their role; or
- disclose confidential information other than where authorised or legally required.

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13. Recording and Transparency

Meeting minutes shall record:

- the nature of the declared interest;
- any withdrawal from discussion or voting;
- how the conflict was managed; and
- the resulting decision.

Records should provide clear evidence that decisions were taken objectively and in the best interests of the Trust.

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14. Monitoring and Compliance

The Audit and Risk Committee shall oversee implementation of this policy and receive appropriate assurance regarding:

- completion of annual declarations;
- maintenance of the Register of Interests;
- management of conflicts of interest;
- gifts and hospitality declarations; and
- related party relationships and transactions.

Non-compliance with this policy may result in governance, disciplinary or regulatory action.

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15. Review

This policy shall be reviewed by the Trustees every three years, or earlier if there are changes to legislation, regulation or guidance.

APPENDIX A

Declaration of Business, Pecuniary and Other Relevant Interests

Personal Details

Name: _____

Role: _____

Academy / Committee (if applicable): _____

Declaration Date: _____

Register of Interests

Please declare any interest that could give rise to an actual, potential or perceived conflict of interest.
This includes, but is not limited to:

- Directorships
- Trusteeships
- Governorships
- Employment
- Self-employment
- Partnerships
- Significant shareholdings
- Ownership of businesses
- Consultancy arrangements
- Relationships with suppliers, contractors or customers of the Trust
- Close family relationships within the Trust
- Membership of organisations that may seek to influence Trust decisions
- Any other interest that could reasonably be perceived as influencing your judgement.

Name of Organisation / Business	Nature of Organisation	Nature of Interest	Date Interest Commenced	Date Interest Ceased

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Nil Return

☐ I have no business, pecuniary or other relevant interests to declare.

Declaration

I declare that:

- The information provided is complete and accurate to the best of my knowledge.
- I will notify the Lead Governance Professional promptly of any changes.
- I have read and will comply with the Trust's Conflicts of Interest Policy.
- I understand that completion of this declaration does not remove my responsibility to declare relevant interests at meetings when matters arise that may create an actual, potential or perceived conflict of interest.

Signed: _____

Date: _____

Completed forms should be returned to the Lead Governance Professional for entry onto the Trust Register of Interests.