



Name of policy:	Conflicts of interest policy and procedure
Last approved:	March 2026
Applies to:	Trust Members, Trustees, local Governors, co-opted members, Senior Executive leaders, and senior staff attending Trust Board or committee meetings
Approved by:	Trust Board via Audit & Risk committee
Owner:	Governance Professional to the Trustees (GP)
To be reviewed	Minimum every 3 years, or sooner if required by legislation or the Academy Trust Handbook

1. Purpose and Scope

This policy applies to all individuals involved in the governance of the Trust, including Members, Trustees, Local Governors, co-opted members, and senior staff attending governance meetings (“members”).

Its purpose is to:

- Protect the integrity and transparency of the Trust’s decision-making.
- Ensure compliance with the Trust’s Articles of Association, the Charities Act 2011, and the Academy Trust Handbook.
- Maintain public confidence in the Trust’s governance.
- Protect the reputation of the Trust and its members.

The policy applies to all Trust Board meetings, committee meetings, local governing body meetings, working groups, and any other governance-related activities.

2. Definition of a Conflict of interest

A conflict of interest is any situation in which a member’s personal interests, duties, or loyalties could – or could reasonably be perceived to – prevent them from making a decision solely in the best interests of the Trust.

Conflicts typically arise where:

a. Financial or measurable benefit

A member or a connected person may receive a direct or indirect financial or other measurable benefit.

Under the Charities Act 2011, a “connected person” includes:

- A child, parent, grandchild, grandparent, brother or sister.
- A spouse or civil partner.
- A person living with the trustee as spouse or civil partner.
- A business partner of the trustee or of any person listed above.
- A firm or company in which the trustee or a connected person has a significant interest or control.

- A trustee of a trust where the trustee or a connected person is a beneficiary.

b. Conflicts of loyalty

A member's duty to the Trust may compete with a duty or loyalty owed to another organisation or person.

The Charity Commission's guidance *Conflicts of Interest: A Guide for Charity Trustees* provides further examples.

3. Principles

Members must act in accordance with:

- The Trust's Articles of Association
- The Charities Act 2011
- The Academy Trust Handbook
- The Seven Principles of Public Life (Nolan Principles): Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty, Leadership.

The existence of a conflict does not imply wrongdoing. Many arise naturally from members' professional and personal connections. However, they must be declared and managed appropriately.

4. Appointments

Prospective Members, Trustees, local Governors and co-opted members must declare any potential conflicts during their recruitment. Where conflicts are likely to be frequent, serious, or unmanageable, the Trust may decide not to proceed with the appointment.

5. Register of Interests

All members must complete a written declaration of interests on appointment, including a "nil return" where applicable. The Register of Interests will be:

- Maintained by the Governance Professional (GP)
- Reviewed annually at the start of each academic year
- Updated promptly whenever circumstances change
- Shared with the Trust Board at the first full meeting of the academic year
- Published on the Trust's website in accordance with the Academy Trust Handbook.

Information will be processed in accordance with the Data Protection Act 2018 and UK GDPR, and used only for ensuring compliance with governance requirements.

6. Pre-meeting identification of conflicts

Before each meeting, the GP and Chair will review agenda items to identify potential conflicts. Where a conflict is identified, the GP will notify the member concerned.

Depending on the seriousness of the conflict, actions may include:

- Full participation except in decision-making
- Participation in discussion but exclusion from decision-making
- Exclusion from both discussion and decision-making
- Withholding of relevant papers

- In rare cases, where the conflict is ongoing and unmanageable, discussion with the member about resignation.
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7. Management of conflicts during meetings

Every meeting agenda will include a standing item for declarations of interest.

Members must declare:

- Any actual or potential conflict relating to agenda items
- Any conflict that arises during discussion.

If a conflict has not been pre-assessed, the conflicted member may be required to withdraw while the remaining members determine the appropriate action.

A conflicted member:

- Will not count towards quorum for the relevant item
- Must not vote on the matter
- May re-join the meeting once the item is concluded.

Members aware of an undeclared conflict affecting another member should notify the Chair or GP.

8. Related-party transactions

The Trust will comply fully with the Academy Trust Handbook requirements, including:

- Reporting all related-party transactions to the Department for Education (DfE)
- Obtaining DfE approval for transactions requiring prior approval
- Ensuring transactions are “at cost” and demonstrably in the Trust’s best interests
- Ensuring no member receives remuneration for their role unless expressly permitted by law or the Articles.

Legal advice will be sought where necessary.

9. Recording and reporting

Minutes of meetings will clearly record:

- The nature of a conflict
- Who was affected
- How the conflict was declared
- Actions taken to manage it
- A summary of the discussion
- The final decision and rationale.

Where a member receives a financial benefit (in compliance with legal requirements), this will be reported in the annual report and financial statements if required by auditors.

10. Failure to disclose an interest

Failure to disclose a relevant interest may constitute a breach of the Trust’s Code of Conduct and this policy.

The Trust Board Chair (or Vice Chair of Trustees, if the Chair is conflicted) will determine appropriate action, which may include:

- Formal warning
- Suspension or removal from office (for governance roles)
- Disciplinary action (for staff)
- Reporting to the Secretary of State as principal regulator
- Referral to the Charity Commission in cases of serious breach.

Where a conflict results in significant harm to the Trust, a serious incident report may be submitted.

11. Review of policy

This policy will be reviewed every three years, or sooner if required by changes in legislation, Charity Commission guidance, or the Academy Trust Handbook. The Audit & Risk Committee will review the policy before approval by the Trust Board.