

Conflicts of Interest Policy for Trustees

Policy Details

|  |  |
| --- | --- |
| Policy Level | Trust |
| Document Approver | Trust Board |
| Document Status | Draft |
| Applicable to | All Trust Employees  |
| Review Frequency | Every 3 Years |

Revision History

|  |  |  |  |
| --- | --- | --- | --- |
| Revision | Date | Details | Approved by |
| 0 | August 2025 | First Issue |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

Contents

[1. Introduction 3](#_Toc206421000)

[2. Scope of Policy 3](#_Toc206421001)

[3. Defining a Conflict 3](#_Toc206421002)

[4. Register of Interest 3](#_Toc206421003)

[5. Declaration Process 3](#_Toc206421004)

[6. Managing Related Party Transactions (RPTs) 3](#_Toc206421005)

[7. Prevention and Oversight 4](#_Toc206421006)

[8. Transparency and Accountability 4](#_Toc206421007)

[9. Breach and Remedial Action 4](#_Toc206421008)

[10. Review 4](#_Toc206421009)

[Summary table 5](#_Toc206421010)

# Introduction

This policy ensures that Trustees act solely in the best interests of the Trust, upholding the Nolan Principles of **Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty, and Leadership** [Good Governance](https://www.good-governance.org.uk/publications/insights/the-nolan-principles)while adhering to statutory duties under the Academy Trust Handbook, Charity Law, and Company Law. It establishes rigorous guidance on identifying, managing, preventing, recording, and reporting conflicts of interest, including **related party transactions**, as required by DfE guidance [GOV.UK](https://www.gov.uk/government/publications/related-party-transactions-information-for-academy-trusts/managing-conflicts-of-interests-related-party-relationships-and-related-party-transactions-good-practice-guide?utm_source=chatgpt.com).

# Scope of Policy

Applies to all individuals involved in governance and management:

* Trustees
* Members
* Local governors or committee members
* Senior employees and any person who may influence trust decisions.

# Defining a Conflict

A Conflict maybe **Actual, Potential** or **Perceived,** and arises when personal interests could influence, or appear to influence decisions made in the Trust’s best interests [Governance Guidance](https://www.gov.uk/government/publications/conflicts-of-interest-a-guide-for-charity-trustees-cc29/conflicts-of-interest-a-guide-for-charity-trustees?utm_source=chatgpt.com)  All situations must be treated carefully and managed proactively.

# Register of Interest

* All Trustees and relevant personnel must complete a **Register of Interests** including relationships with employees, governors, members, and related parties [Governance Guidance](https://www.gov.uk/guidance/academy-trust-handbook/part-5-delegated-authorities?utm_source=chatgpt.com).
* The register is maintained and reviewed at least **annually**, and updated promptly whenever new interests arise.
* It must be available on request for public inspection [GOV.UK](https://www.gov.uk/government/publications/academy-trust-handbook/academy-trust-handbook-2025-effective-from-1-september-2025?utm_source=chatgpt.com).

# Declaration Process

* At the beginning of each meeting, Trustees should declare any interests specific to agenda items.
* Trustees must **withdraw** from decision-making on issues where they have a declared interest unless invited to remain for clarity or record-keeping, in compliance with documented processes. If they do remain, their presence and reasons must be explicitly recorded.
* All declarations, actions, and outcomes must be **minuted**.

# Managing Related Party Transactions (RPTs)

* Related party transactions must comply with the **Academy Trust Handbook** and the DfE’s **Good Practice Guide** [Academy Trust Handbook](https://www.gov.uk/government/publications/academy-trust-handbook/academy-trust-handbook-2025-effective-from-1-september-2025?utm_source=chatgpt.com)
* Any transaction with a related party (e.g., a company controlled by a Trustee, close family) must be:
* Fully disclosed
* Subject to **independent scrutiny**
* Approved by the Board in advance—and if required, submitted via the DfE’s **online RPT form** or reported in year-end accounts [The Guardian](https://www.theguardian.com/politics/2024/feb/01/overhaul-uk-ministers-ethics-system-cross-party-commission-urges?utm_source=chatgpt.com).
* The Board must be satisfied that the transaction represents **value for money** and is in the Trust’s best interests.

# Prevention and Oversight

* The Trust will implement **robust systems** to identify and manage conflicts early [Conflict of Interest Guide](https://www.gov.uk/government/publications/conflicts-of-interest-a-guide-for-charity-trustees-cc29/conflicts-of-interest-a-guide-for-charity-trustees?utm_source=chatgpt.com).
* Internal scrutiny (e.g., internal audit) includes specific checks on conflicts, related party transactions, and governance controls.
* Trustees receive **induction and refresher training** on conflicts of interest and good governance - [Governance Guidance](https://www.gov.uk/guidance/-governance-in-academy-trusts/4-non-executive-leadership?utm_source=chatgpt.com)

# Transparency and Accountability

The Trust will publish:

* Annual audited accounts including disclosures of any trustee or related party benefits [Governance Guidance](https://www.gov.uk/guidance/-governance-in-academy-trusts/4-non-executive-leadership?utm_source=chatgpt.com)
* On request access to agendas, minutes and relevant documents (excluding confidential personnel or pupil matters) [Academy Trust Handbook](https://www.gov.uk/government/publications/academy-trust-handbook/academy-trust-handbook-2025-effective-from-1-september-2025?utm_source=chatgpt.com)

Trustees must be prepared for public and regulatory scrutiny, reflecting the Nolan Principles of **Openness, Accountability**, and **Honesty** [Strategy Leadership Governance](https://www.good-governance.org.uk/publications/insights/the-nolan-principles?utm_source=chatgpt.com)

# Breach and Remedial Action

Any breach of this policy must be reported to the Chair or Governance Lead immediately.

The Board will investigate and may:

* Require recusal or resignation of the individual
* Reverse or renegotiate affected transactions
* Notify regulators, including the Charity Commission or DfE, where necessary.

This upholds the Nolan Principles of **Integrity, Objectivity, Leadership**, and upholds the Trust’s reputation.

# Review

The Policy will be reviewed annually or following material regulatory changes or governance reviews.

Trusteed are responsible for ensuring its application and relevance.

## Summary table

|  |  |
| --- | --- |
| Principle  | **How is Features in the Policy**  |
| Selflessness  | Trustees act solely for the Trust’s public benefit, not personal gain. |
| Integrity & Objectivity  | Full Disclosure; independent scrutiny of conflicts  |
| Accountability & Openness  | Transparent registers, minutes, published documentation, public inspection |
| Honesty & Leadership  | Honest declarations and robust leadership in managing and resolving conflicts  |
| Statutory Compliance  | Aligned with the Academy Trust Handbook, DFE Food Practice Guide, and Charity Commission Law.  |