



KALEIDOSCOPE LEARNING TRUST

Conflict of Interests Policy

Version and Date	Author	Committee Responsible	Review frequency	Approval	Next Review Due	
1.0	17.11.2015	Mrs J Whiston	L&M	3 yearly	Approved by the Full Board on 24.11.2015	23.11.2018
1.1	02.12.2019	Miss J Evans	Board of Trustees	3 yearly	Approved by the Board on 02.12.2019	01.12.2022
1.2	04/07/2022	Miss M Duval	Board of Trustees	3 yearly	Approved by Trust Board on 07/12/2022	07/12/2025

Background

The Trust and its Academies are required to comply with the Academy Trust Handbook with regard to conflicts of interest and related party transactions. This requires that no member, trustee, employee or related individual or organisation uses their connection to the academy trust for personal gain.

A conflict of interest is any situation in which a trustee's personal interests or loyalties could – or could be seen to - prevent the trustee from making a decision only in the best interests of the academy.

In order to do this the members, trustees and senior staff will:

1. Identify conflicts of interest

Trustees and staff each have an individual personal responsibility to declare conflicts of interest which may affect them.

All trustees and senior staff will therefore be required to complete a declaration of interests return on an annual basis. This return should record:

- All business interests of any significance.
- Offices or posts held with other organisations
- Interests of close relatives where there may be any possibility that the academy has dealings with that person/organisation

In addition, there will be an agenda item at all meetings of the governing body to allow declarations of interest to be made.

If a trustee is uncertain whether or not he or she is conflicted, he or she should err on the side of openness, declaring the issue and/or discussing it with the Chair of the Trust Board.

Senior staff and others who make financial decisions or are involved in financial or purchasing decisions on a regular basis must ensure any conflict is identified and declared immediately.

If any employee perceives there may be a potential conflict of interest in making a decision but is uncertain as to the correct course of action he/she should initially speak to the Governance Professional or Chief Finance and Operating Officer.

If a trustee or employee is aware of an undeclared conflict of interest affecting another trustee or employee, they should notify the Chair of the Trust Board, Governance Professional or Chief Executive Officer.

2. Prevent the conflict of interest from affecting the decision

Trustees and senior employees must make their decisions only in the best interests of the academy. This means that they must consider the issue of the conflict of interest so that any potential effect on decision making is eliminated. How they do this will depend on the circumstances.

Where trustees have decided against removal of the conflict of interest they must prevent it from affecting any decision or course of action.

Trustees are required to declare any interest at an early stage and, in most cases it will be sufficient for them to withdraw from the relevant meetings, discussions, decision-making process and votes.

In cases of more serious conflicts of interest it may mean the trustees deciding 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 even:
- not appointing a particular trustee/employee or securing a trustee resignation

3. Record conflicts of interest

Declared interests will be recorded in a register and updated annually. If interests change the Trust should be advised (via the Chief Finance and Operating Officer or Governance Professional).

Any conflict of interest which arises in the course of business must be declared at the relevant meeting and will be recorded (normally in minutes).

4. Disclosure

Details of any payments and other benefits to any Trustees or connected persons – including family members and businesses, will be identified to auditors.

Relevant interests declared by trustees will be listed on the Trust website. The Chair of Trust Board will use discretion to determine whether or not a minor or relatively insignificant interest should be included in the public declaration.