



CONFLICT OF INTEREST POLICY

MARCH 2018

CONTENTS

SECTION	PAGE
1.0 Purpose and Scope	2
2.0 Responsibilities	2
3.0 Contract Management	3

1.0 Purpose and Scope

The Governing Body of the Aspire Schools Trust have a legal obligation to act in the best interests of the Trust at all times. Staff and volunteers have similar obligations. This policy is designed to protect both the Trust and its Governors from any appearance of impropriety. It is also intended to ensure that no real or perceived conflicts of interests arise from a Governor's personal, professional or family interests and/or loyalties could lead to a conflict with those of the Trust. The policy also reflects that the Board will include parents of existing pupils who will inevitably have an interest in decisions made which will impact on their children's education, policies which might affect their children and on the fees paid.

2.0 Responsibilities

The Trust will:

- all Governors and staff to declare their interests, and any gifts or hospitality received in connection with their role within the Trust on an annual basis or when any changes occur;
- store, process and use register of interests information in accordance with current data protection principles;
- use independent external moderation where conflicts cannot be resolved through internal procedures.

Governors will:

- ensure that they have declared information about their interests and are kept up to date;
- contact the Clerk to the Governors for confidential guidance
- about what they should declare;
- only be involved in decisions that directly affect them or the child(ren) they care for, when they have declared their interest and be prepared to withdraw from any subsequent discussion if they consider or it may be perceived by other interested parties that they are unable to remain objective;
- be able to participate in discussions from which they may indirectly benefit, for example where the benefits are universal to all users, or where your benefit is minimal but they will declare any such interest;
- not vote on matters directly affecting their own interests. A quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate;
- not be involved in managing or monitoring any contract in which they have an interest.

The Clerk to the Governors will:

- maintain a register of interests which will be maintained by the Clerk to the Governors, and information about Governors will be accessible to the Chairman of Governors;
- either in person, or through the Chairman of the Governors, declare a known interest on behalf of any individual who fails to declare an interest;
- record and report in the minutes of the meeting, all decisions where there is a conflict
- of interest including:
- the nature and extent of the conflict;

- an outline of the discussion;
- the actions taken to manage the conflict.

3.0 Contract Management

The Trust has many contracts but it will ensure that where a Governor benefits from a decision, this fact will be reported in the trustees' annual report in accordance with SORP 2005;

- a de minimis exemption applies to contracts of less than £500 in value. Random checks against the register of interests will be made on the award of contracts below this value. If the cumulative value of a series of small contracts exceeds £3,000, the Governors will operate the policy used for individual contracts over that sum;
- the de minimis exemption does not apply to contracts of employment with the Trust.