

Policy/Procedure Name:	Conflict of Interest Policy		
Policy/Procedure Number:	TLT 006		
Revised Date:	October 2023		
Review by Date:	November 2025		
Policy/Procedure Author:	Finance and Resources Director		
Policy/Procedure Owner:	Chief Executive		
Management Committee Approved By:	TLT		
Trustee/Governor Committee (where appropriate) Approved By:	Finance and Investment Committee		
For Action By:	Employees, Contractors, Agency staff, Trustees and Governors		
For Information to:	Employees, Contractors, Agency staff, Trustees and Governors		
Approval requested to upload on the Treloar's Website:	Yes <input type="checkbox"/> (tick if requested)		
Who is carrying out EIA?	Lorna Woodcroft	Date of EIA?	10/11/2023
Have we shown due regard for the 9 protected characteristics within the policy/procedure?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Are all opportunities to promote equality taken within the policy/procedure?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Refer Policy/Procedure to EDI Co-ordinator for further assessment	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

Aim

The purpose of this policy is to provide guidance to relevant individuals on handling possible conflicts of interest that may arise during their involvement with the Treloar's in their role of an employee, Governor or Trustee.

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1. Policy/Procedure Details

Definition of conflict of interest

A conflict of interest is a situation in which a professional judgment or actions of an individual or organisation are influenced by a secondary interest (such as other business or private interests).

Trustees and Governors

The matter of conflict of interest is addressed and responsibilities outlined in both the Treloar Trust Articles of Association and the Treloar School and College Instruments and Rules of Government.

The Trustees and Governors are required to declare any potential or actual conflicts of interest to the Secretary to Trustees or the Clerk to the Governors.

Employees, contractors, bank staff

The Finance and Resources Director is responsible for communicating the Conflict of Interest Policy to all relevant individuals and all individuals have responsibility for ensuring that they are familiar with the Conflict of Interest Policy.

Roles and Responsibilities

All individuals have a responsibility to be familiar with the Conflict of Interest Policy.

An individual is required to communicate any issues to his/her line manager or if not appropriate to the Finance and Resources Director. Individuals are protected by the Treloar's Whistle-blowing Policy.

A line manager is required to either resolve the issue or escalate it to the relevant member of the Treloar's Leadership Team. Sometimes, and as a minimum, a conflict of interest may be managed by the individual excusing themselves from the part of the meeting where matters relating to the conflict are discussed or decided.

The Treloar's Leadership Team is responsible for resolving the issue or, for issues that are not resolvable report the issue to the Secretary to Trustees or to the Clerk to the Governors.

The Secretary to Trustees and the Clerk to the Governors are responsible for deciding when and how matters will be escalated and when they will be reported to the Board of Governors and Trustees and to the regulators.

The Treloar's has Gifts/Hospitality/Bequests to Staff, Employees taking a second Job and Anti-Bribery Policies.

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2.1 Key Responsibilities

Action	Responsibility
Ensure that all managers, employees and volunteers of Treloar's have access to the related procedures.	Treloar's Leadership Team/Finance and Resources Director
Ensure that all managers, employees and volunteers of Treloar's have access to the related procedures.	All Managers
Communicate any issues to a line manager or if not appropriate to the Finance and Resources Director	All Staff
Declare any potential or actual conflicts of interest to the Secretary to Trustees or the Clerk to the Governors	Governors and Trustees

2. Implications of Policy/Procedure

2.1 Training Requirements

Action	Responsibility
Train all managers, employees and volunteers in the implementation of the policy and the related procedures.	Human Resources Director (delegated to Training Manager)
Ensure that all new employees, staff and volunteers know their responsibilities, and receive training in carrying these out.	All Managers
Ensure that all new employees, staff and volunteers are made aware of the policy, understand it, and know where to access a copy and where to access the related procedures.	Training Manager

2.2 Communication Requirements

How will the Policy/procedure be communicated:	Electronically
Who will ensure the above communication is carried out:	Finance and Resources Director
Do the changes made to this policy/procedure affect any other policies/procedures? If yes, has this been communicated to the policy/procedure author/owner	Do not affect.

Inclusive Communications

If you require this document in an alternative format, such as large print, audio description, or a coloured background, please contact Jo Cox at jo.cox@treloar.org.uk

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2.3 Other Implementation Requirements

3. Monitoring and Review

Bi-annually

4. Links to other related policies, procedures or documents (internal)

FIN 004 - Sharing Fee Information
TLT 003 - Anti-Bribery Policy
HR 019 - Whistle blowing Policy
HR 029 - Gifts/Hospitality/Bequests to Staff
HR 017 – Employees taking a second job
Governor Code of Conduct
Treloar Trust Articles of Association
Treloar School and College Instruments and Rules of Government

5. Further sources of information (external)

6. References

7. Definitions

8. Revision History

Listed below is a brief audit trail, detailing amendments made to this policy procedure in last 4 years

Page/para No.	Brief description of the change(s)	Change made by	Date
all	New policy	Simon Birch	Jan '15
P1	Approving committee	Simon Birch	Feb '17
P2 & 4	Reference to HR 017 Employees taking a second job	Simon Birch	March 2019
P2	Amendment to include 'Policy' in Employees, contractors and bank staff paragraph	Simon Birch	Nov 2019
P2	Amendment to paragraph concerning escalation of issues to the relevant member of the Treloar's Leadership Team	Simon Birch	Oct 2021
	Reviewed. No change.	Simon Birch	Oct 2023

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IMPORTANT NOTES:

It is essential for those with designated responsibilities to familiarise themselves with the sources of information, referred to above.

Policy documents describe mandatory minimum standards and will be subject to audit and review. Line managers are required to ensure suitable and sufficient arrangements are in place to meet policy requirements, including the provision of information and instruction to staff.

Appendix 1 - Equality Impact Assessment (EIA) - Stage 1

Name of Policy / Function/Decision	TLT 006 Conflict of Interest Policy
Name of Assessor / Author /Lead	Lorna Woodcroft
Start Date	10/11/23
This EIA is being undertaken because it is:	<p><i>Delete as appropriate</i></p> <ul style="list-style-type: none"> • Part of a project proposal submission • A result of organisational change • A result of new policy • A result of a policy revision <p>Other:</p>

Screening

Does the policy affect employees, students or other stakeholder groups? Could the impact be significant to that group of people?	N
Is it a major policy with a significant effect on how our core business is delivered?	N
Does it involve a significant commitment of resources?	N
However this proposal will be giving back and reducing 'commitment of resources' not increasing	N
Does it relate to an area where there are known inequalities (e.g. gender pay gap, hate crime, accessibility of IT)	N

If the answer to any of these questions is 'YES' then continue to complete Equality impact assessment. If you are unsure about the answer to any of these questions please contact EDI co-ordinator or Head of Quality for further support.

Has the screening identified the policy as having relevance to the any of the following groups?					
Age	N	Disability	N	Sexual Orientation	N
Race	N	Sex/Gender	N	Religion or Belief	N
Gender Reassignment	N	Pregnancy or Maternity	N	Marriage or civil partnership	N

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Have we shown due regard for the 9 protected characteristics within the policy/procedure/decision?	Yes <input type="checkbox"/>
Are all opportunities to promote equality taken within the policy/procedure/decision?	
Have we stated how we will monitor the implementation and impact of this policy/decision?	Yes
Date of Screening	10 th November 2023
Approval by EDI	Lorna Woodcroft
Refer Policy/Procedure to EDI Co-ordinator for further Stage 2 Assessment (if required)	Yes <input type="checkbox"/> No <input type="checkbox"/>