




The Hawkmoor Learning Trust Conflicts of Interest Policy

(Version 1 : Revised 14 Nov 23)

	Signed	Date
Date adopted by Trustees	Signature: 	30-02-2024
	Print name: Peter Spruce	Insert date
	On behalf of the Hawkmoor Learning Trust	
Adoption by Local Governing Body		

1. Policy

- 1.1. The purpose of this Conflicts of Interest Policy (Policy) is to protect the
 - 1.1.a. integrity and ethical standards of the Trust Board / Board of Governors (Board) and
 - 1.1.b. the integrity of an individual Trustee / Governor who may face a conflict of interest.
- 1.2. This Policy is intended to assist each individual Trustee / Governor in
 - 1.2.a. fulfilling the Trustee's / Governor's fiduciary duty to act in the best interests of the Trust / academy and
 - 1.2.b. demonstrating high personal standards of moral responsibility, character, and ethics, both of which also protect the integrity of the Board as a whole.

2. General

- 2.1. A conflict of interest arises when a Trustee's / Governor's private or personal interest supersedes, competes with, or undermines the Trustee's / Governor's;
 - 2.1.a. exercise of independent judgment and
 - 2.1.b. fulfilment of duty and responsibility.
- 2.2. The foregoing could arise from an actual, potential or perceived conflict of interest of a financial or non-financial nature.
- 2.3. The Chair of a meeting of the Board / Committee has a responsibility for taking all reasonable steps to ensure that the opportunity exists at each meeting for each Trustee / Governor to declare any conflict(s) of interest.
- 2.4. Each Trustee / Governor must immediately take steps to resolve an actual, perceived or potential conflict of interest.

3. Process

- 3.1. At the beginning of each Board / Committee meeting, the Chair shall ask for disclosures of any actual, potential or perceived conflicts of interest relating to any agenda item.
- 3.2. In cases where a conflict cannot be avoided, a Trustee / Governor is to declare a conflict of interest at the earliest opportunity, the nature of the conflict and all relevant circumstances.
- 3.3. Where a conflict of interest is declared before a Board / Committee meeting, the declaration should be made to the Board / Committee Chair, the Board / Committee is to be informed.
- 3.4. Where a Trustee / Governor is unsure whether the Trustee / Governor is in a conflict of interest, the Trustee / Governor shall raise the matter in advance with the Board.
- 3.5. The Board will determine, by majority vote, whether or not a conflict exists and, if so, the appropriate course of action.

- 3.6. The Trustee / Governor raising the issue must refrain from voting on whether or not a conflict exists, nor unduly influence the management of the conflict.
- 3.7. If there is deemed to be a conflict of interest, the Trustee / Governor must not take part in any debate or voting on the subject.

4. **Day to Day Management**

- 4.1. The Trust will retain a Central Register of Trustee's / Governor's interests.
- 4.2. The Register will be reviewed and updated after each meeting of the Board / Committee meeting.
- 4.3. The Register will be consulted when contracts of significant value are being awarded.

14 Nov 23

Jonathan Davis
Trust Finance Director