

Policy/Procedure Name:	Sharing Fee Information		
Policy/Procedure Number:	FIN 004		
Revised Date:	August 2026		
Review by Date:	September 2029		
Policy/Procedure Author:	Finance and Resources Director		
Policy/Procedure Owner:	Finance and Resources Director		
Management Committee Approved By:	TLT		
Trustee/Governor Committee (where appropriate) Approved By:	Trustee Board		
For Action By:	Trust Finance Officers, Finance Director, Secretary/Clerk to the Trustees and Governors, Trustees and Governors, members of TLT, Admissions Team, Outreach Team		
For Information to:	Staff		
Approval requested to upload on the Treloar Website:	Yes ☐ (tick if requested)		
Who is carrying out EIA?	Finance and Resources Director	Date of EIA?	27 March 2017 (no material change)
Have we shown due regard for the 9 protected characteristics within the policy/procedure?	Yes ☒ No ☐		
Are all opportunities to promote equality taken within the policy/procedure?	Yes ☒ No ☐		
Refer Policy/Procedure to EDI Co-ordinator for further assessment	Yes ☐ No ☒		

1. Policy/ Procedure Aim –

Aim is to inform about:

- Guidelines on sharing fee information
- Enforcement guidelines

2. Policy/Procedure Details

Sharing Fee Guideline

Guideline

1) It is Trust policy that no one at the Trust should share any Treloar Pricing Data, or otherwise collaborate in pricing, with other Similar Service Providers or their representatives. Equally, no one should share costing information, or information on other matters, that could reasonably and objectively be viewed as influencing pricing. The reason for this policy is to protect the Trust and its officers from breaching strict competition laws which impose penalties where actions are taken which could be regarded as leading to price fixing.

2) Treloar's shall participate in financial information surveys only to the extent that they are collated and disseminated by an independent source and that the resultant exchange of information is sufficiently aggregated and anonymous.

3) Governors or Trustees who have a relationship with a Similar Service Provider, for instance as an employee, governor or trustee, shall declare that interest to the Secretary/Clerk to the Trustees/Governors and follow the Trust's conflict of interest policy. In any event the Governors or Trustees concerned shall excuse themselves from any part of any Governor or Trustee meeting at which Treloar Pricing Data or information on any other matter is discussed that could reasonably and objectively be viewed as influencing pricing.

4) In the event that anyone requires clarification over any aspect of this policy or any particular circumstance, they should discuss the matter in the first instance with the Finance Director.

Enforcement

The Finance Director shall be responsible for identifying and maintaining a list of all staff likely to come into contact with Treloar's Pricing Data. The Finance Director (FD) shall write to all such staff no less than annually reminding them of this guideline and asking that any potential breach of the policy be reported to the FD so that they can in turn advise the Trustees/Governors.

The Secretary/Clerk to the Trustees/Governors shall write to the Governors and Trustees annually and request declarations of all potential conflicts of interest and shall monitor Trustee/Governor adherence to guideline 3 above.

Definitions Used in Guideline

Treloar Pricing Data: Any prices/fees charged to the EFA/Local authorities or anyone else either for attendance at the School and College or for the provision of other services or facilities. This definition includes historic as well as current data even when it is in the public domain but does not include pricing/grids that are set by the EFA and over which Treloar's has no influence and may not include qualitative content such as how we charge fees or deal with issues affecting costs.

Similar Service Provider: Any special school or college that might conceivably be an alternative placement for a student and to include all facilities that caters predominantly for physically disabled children/young people.

2.1 Key Responsibilities

Policy/Procedure Communication and Implementation Action Plan - Amend and add to as appropriate		
	Action	Responsibility
1	Write to all Trustees and Governors annually requesting declarations of all potential conflicts of interest.	The Secretary/Clerk to the Trustees/Governors
2	Monitor responses to declared conflicts of interest and potential breaches of policy.	The Secretary/Clerk to the Trustees/Governors
3	Circulate Policy annually to staff likely to come into contact with Treloar Pricing Data.	Finance Director

3. Implications of Policy/Procedure

3.1 Training Requirements

3.2 Communication Requirements

How will the Policy/procedure be communicated:	Sharepoint
Who will ensure the above communication is carried out::	PA to 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	No

3.3 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

3.4 Other Implementation Requirements

4. Monitoring and Review

Bi-annually

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

6. Further sources of information (external)

7. References

8. Definitions

9. 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
N/A	Reviewed - no changes	SB	09/08/2021
N/A	Reviewed – no changes	SB	11/11/2022
N/A	Reviewed – no changes	SB	30/08/2023
N/A	Reviewed – no changes	AMJ	05/09/2025
N/A	Reviewed – no changes	AMJ	25/08/2026

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.