

Policy/Procedure Name:	Conflict of Interest Policy		
Policy/Procedure Number:	TLT006		
Revised Date:	25 November 2019		
Review by Date:	25 November 2021		
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 Website:	Yes <input type="checkbox"/> (tick if requested)		
Who is carrying out EIA?	Finance and Resources Director	Date of EIA?	22/03/2017
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 Trust 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 Trust's Whistle-blowing Policy.

A line manager is required to either resolve the issue or escalate it to the relevant Director.

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

2.1 Key Responsibilities

Action	Responsibility
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Ensure that all managers, employees and volunteers of Treloar Trust have access to the related procedures.	Treloar Leadership Team/Finance and Resources Director
Ensure that all managers, employees and volunteers of Treloar Trust 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

2.3 Other Implementation Requirements

2.4

3. Monitoring and Review

Bi-annually

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

FIN 04 - Sharing Fee Information
TLT 03 - Anti-Bribery Policy
HR 19 - Whistle blowing Policy
HR 29 - Gifts/Hospitality/Bequests to Staff
HR 17 – 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 HR17 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

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.

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