



ACET Conflict of Interest Policy

DATE: January 2026

POLICY LEAD: Director of Governance Risk & Compliance

APPROVED BY: Trustees



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Equity



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DOCUMENT CONTROL

Policy Level	Trust	
Approved By	Trustees	
Approval Date		
<p>This policy remains valid until it is reviewed and replaced; it does not expire by date alone. Policies are reviewed annually, or sooner if required by statutory or legislative changes, in line with best practice</p>		
Policy Lead / Author	Natalie Borrington	
Version Number	Date Issued	Updated Information
<p>Please complete this section with a brief summary of the changes you have made or if this is a full re-write / new policy. The contents of this version control box will be shared with trustees / the LGB as part of the approval process – Thank you</p>		
V1	January 2026	New Policy

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1. Purpose

Aston Community Education Trust (“the Trust”) is committed to the highest standards of integrity, transparency and accountability in the conduct of its governance and operations.

This policy sets out the framework for identifying, declaring, managing and recording **conflicts of interest and loyalty** to ensure that all decisions are made solely in the best interests of the Trust and its charitable objects.

The Trust accepts that conflicts of interest cannot be avoided altogether, so organisations should develop a policy to manage them effectively, when they arise. The existence and application of a conflicts of interest policy will serve as a means of demonstrating good practice and governance under external scrutiny. A well-written and properly implemented policy will support trustees in establishing that they have acted in the charity’s best interest.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

This policy supports compliance with:

- The Trust’s Articles of Association
- The Academy Trust Handbook
- The Academy Trust Governance Guide
- The Charity Governance Code
- The Charities Act 2011
- The Companies Act 2006

2. Scope

This policy applies to:

- Members
- Trustees (including the Chair and Vice Chair)
- Local Governing Body (LGB) members (where applicable)
- The Accounting Officer / Chief Executive Officer
- Senior leaders
- All employees
- Volunteers and committee members
- Any person or organisation acting on behalf of the Trust

3. Principles

The Trust is guided by the **Seven Principles of Public Life**:

Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership.

All individuals covered by this policy must:

- Act in the best interests of the Trust at all times
- Avoid situations where personal interests conflict, or may appear to conflict, with Trust interests
- Declare interests fully, openly and promptly

4. Definition of a Conflict of Interest

A conflict of interest arises where an individual's:

- Personal interests
- Financial interests
- Family or close personal relationships
- Professional or business interests
- Loyalty to another organisation

could influence, or reasonably be perceived to influence, their decision-making on behalf of the Trust.

Conflicts may be:

- **Actual** – currently influencing decision-making
- **Potential** – may arise in the future
- **Perceived** – could be seen by others as influencing decisions

A conflict of interest can be defined as:

‘...any situation in which a trustee's personal interests or responsibilities they owe to another body, may, or may appear to influence the trustee's decision making.’

Conflicts of interest arise when the interests of trustees, or ‘connected persons’, are incompatible or in competition with the interests of the charity. Such situations present a risk that trustees will make decisions based on these external influences, rather than the best interests of the charity.

5. Related Parties

For the purposes of this policy, a **Related Party** includes (but is not limited to):

- Trustees and Members
- Senior employees
- Close family members

- Business partners
- Organisations in which a relevant person has control or significant influence

All Related Party Transactions must comply fully with the **Academy Trust Handbook** and receive **prior approval** from the DfE where required.

6. Declaration of Interests

6.1 Annual Declarations

All Trustees, Members, LGB members, senior leaders and relevant staff must complete:

- An annual declaration of interests via GovernorHub (or the ACET form if not in a governance role)
- A declaration upon appointment via GovernorHub (or the ACET form if not in a governance role)
- An updated declaration whenever circumstances change

6.2 Register of Interests

The Trust shall maintain:

- A Register of Interests
- A Register of Related Party Transactions

The Register of Interests shall be:

- Reviewed regularly by the Board
- Published on the Trust website in line with statutory requirements as below from the Academy trust Handbook 2025:

1.45 The trust **must** keep a register of any relevant business and financial interests, including governance roles in other educational institutions, for (as a minimum) members, trustees, local governors and senior employees, serving at any point over the past 12 months.

1.46 The register **must** include their full names, date of appointment, term of office, date they stepped down (where applicable), who appointed them and relevant business and financial interests including:

- directorships, partnerships and employments with businesses
- trusteeships and governorships at other educational institutions and charities

for each interest: the name and nature of the business, the nature of the interest and the date the interest began.

1.47 The register **must** identify relevant interests from close family relationships between the academy trust's members, trustees or local governors. It must also identify relevant interests arising from close family relationships between those individuals and employees.

1.48 Trusts should consider whether other interests should be registered, and if in doubt should do so. Boards of trustees **must** keep their register of interests up-to-date at all times.

7. Managing Conflicts of Interest

Where a conflict of interest arises:

1. The individual **must declare the conflict immediately**
2. The declaration must be **recorded in the meeting minutes**
3. The individual must:
 - Withdraw from the discussion
 - Take no part in decision-making
 - Not vote on the matter

The Chair (or Vice Chair where the Chair is conflicted) shall determine how the conflict is managed, ensuring compliance with:

- The Articles of Association
- Charity law
- DfE guidance

8. Conflicts of Loyalty

Conflicts of loyalty occur where an individual owes duties to another organisation (e.g. another trust, company or charity).

Such conflicts must be:

- Declared in the same way as financial conflicts
- Managed to ensure decisions are made solely in the interests of the Trust

9. Related Party Transactions

The Trust will:

- Avoid related party transactions wherever possible
- Ensure all transactions are:
 - At **cost**
 - Transparent
 - Fully compliant with the Academy Trust Handbook

No related party transaction shall proceed without:

- Proper declaration
- Board approval
- DfE approval where required

Failure to declare a related party transaction may constitute a **serious breach of Trust governance**.

10. Employment and Procurement

Individuals involved in recruitment, procurement or contract management must:

- Declare any conflicts before involvement
- Not participate in decisions where a conflict exists

All procurement must follow:

- The Trust's Financial Regulations
- The principles of value for money, fairness and transparency

11. Breach of Policy

Failure to comply with this policy may result in:

- Removal from office (Trustees or Governors)
- Disciplinary action (employees)
- Reporting to the DfE, Charity Commission or Companies House where required (Members)

12. Training and Awareness

The Trust will ensure:

- Trustees and senior leaders receive regular governance training
- Induction includes guidance on conflicts of interest
- Ongoing reminders of declaration obligations

13. Data protection

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 2018. Data will be processed only to ensure that Members, Trustees, Local Governors and senior staff act in the best interests of the trust. The information provided will not be used for any other purpose.

14. Monitoring and Review

This policy will be:

- Reviewed **annually** by the Board of Trustees
- Updated to reflect changes in legislation or guidance

15. Approval

This policy was approved by the Board of Trustees of Aston Community Education Trust on:

Date: _____

Signed (Chair of Trustees): _____