



# CONFLICT OF INTEREST POLICY

**The OHC&AT Board of Directors has agreed this Policy and as such, it applies across the organisation – 26<sup>th</sup> November 2015.**

Jay Mercer  
Chair of OHCAT Board

Darren Coghlan  
Chair of OHC Board

# Conflict of Interest Policy

## INTRODUCTION

Orchard Hill College and Academy Trust (OHC&AT) is committed to providing outstanding educational opportunities for all our pupils and students. Part of this commitment is the resolution to operate in an honest and ethical manner at all times. This policy sets out the ways in which we will ensure that all OHC&AT staff, Governors/Directors and stakeholders will strive to avoid any conflict of interest between the interests of OHC&AT on the one hand and personal, professional and business interests on the other.

## SCOPE

This policy should be referred to whenever an employee, associate or stakeholder of OHC&AT becomes aware of a conflict of interest. A conflict of interest is defined as any situation in which a person has an interest which may compromise their obligations to OHC&AT or to any other body with which OHC&AT has a relationship e.g. a funding body. This includes perceived conflicts of interest (where the person is aware of something likely to compromise objectivity) and potential conflicts of interest (where the person is aware that a situation has the potential to develop into a conflict of interest).

In any or all of the above situations, the person has a duty to disclose the conflict of interest to the relevant colleague or body within OHC&AT, and to take any appropriate actions to mitigate the risk.

## PERSONAL CONDUCT

Upon appointment, all OHC&AT employees are given a copy of the Code of Conduct and are required to adhere to this guidance throughout their term of employment.

Upon appointment, all OHC&AT Governors and Directors are given a copy of the Code of Conduct for Governors and are required to adhere to this guidance throughout their term of office.

Associate staff members are consultants, external verifiers, assessors, developers and trainers; contracted on a part time and/or ad hoc basis, for work that is specific to requirements and compliant with the regulations of OHC&AT. These staff are required to follow OHC&AT guidelines and to ensure they behave in a professional manner at all times.

Other stakeholders might include related organisations such as the Friends of Orchard Hill.

## **GOVERNORS AND DIRECTORS**

Beforehand, or in the course of meetings or activities, committee members will disclose any interests in a transaction or decision where there may be a conflict between OHC&AT's best interests and those of other organisations or persons with which the committee member is involved. If there is any doubt, the potential conflict must be declared anyway and clarification sought from the Clerk. Wherever possible, a governor raising a notification of conflict will be excused for that item on the agenda at the meeting concerned, in order to avoid accusations of damage against the integrity of the organisation.

Governors and Directors should not undertake roles, within governing body, which could give rise to a conflict of interest.

Governors and Directors may for other reasons decide that there is a conflict of interest that requires absence from a governing body meeting due to a belief that their presence will affect the integrity or neutrality of the process. The reason must be shared with the Chair in advance of the meeting where possible or in the meeting if not.

Any alteration to the process of a meeting due to a declaration of a conflict of interest must be minuted.

## **DISCLOSURE AND ASSOCIATED PROCEDURES**

If a staff or associate member, Governor/Director or other stakeholder of OHC&AT knowingly or unintentionally fails to disclose a conflict of interest, they risk not being permitted to remain in their position.

If a member knowingly discloses information obtained during a meeting, within another capacity/role within the organisation, without the express consent of the CEO, Head/Principal or Chair of Governors, they risk not being permitted to remain in their role.

If a staff or associate member or Governor/Director of OHC&AT does not adhere to the guidelines laid down in their Code of Conduct, they risk not being permitted to remain in their position.

All staff or associate members, Governors/Directors and stakeholders of OHC&AT have a responsibility to ensure that they carry out all duties in a professional manner within the remit of their position/role.

## **POLICY REVIEW DETAILS**

<i>Version:</i>	1.0
<i>Reviewer:</i>	Janet Sherborne
<i>Approval body:</i>	Family Board
<i>Date this version approved:</i>	26 <sup>th</sup> November 2015
<i>Due for review:</i>	Autumn 2018

## **RELATED POLICIES AND PROCEDURES**

Code of Conduct  
Finance Regulations  
Whistle Blowing Policy  
Disciplinary Procedure  
Recruitment and Selection Procedure