



CONFLICT OF INTEREST POLICY

1. Introduction

1.1. This Conflict of Interest Policy has been developed to outline obligations and expected best practice, as well as provide guidance in dealing with any unavoidable conflicts of interest, as they may arise.

1.2. All Hartmore School directors, managers, teachers and other staff (including volunteers) have an obligation to act in the best interests of both the School and Hartmore Education Ltd. in accordance with any of Hartmore School governing policy documents.

1.3. Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of Hartmore Education Ltd. Such conflicts may create problems; they can:

- Inhibit free discussion
- Result in decisions or actions that are not in the interests of the trust
- Risk the impression that Hartmore School has acted improperly.

1.4. Specifically, conflicts of interests include matters of material and financial benefit, as well as those involving reputation or other more intangible factors.

1.5. The aim of this policy is to provide guidance to ensure Hartmore Education Ltd., along with all employees from becoming involved in any impropriety, or even appearance of such.

2. Declaration of Interests

2.1. Accordingly, we expect Hartmore School directors, managers, teachers and other staff (including volunteers) to freely, openly and honestly declare all and any of their interests, in full and without reservation, in suppliers, customers and/or competitors, whether financial or other.

2.2. Further, we expect Hartmore School directors, managers, teachers and other staff (including volunteers) to freely, openly and honestly declare all and any gifts or hospitality (over a value of £20) received in connection with their role in the Trust, whether from suppliers, customers and/or competitors, whether financial or other.

2.3. Further, we do not expect Hartmore School directors, managers, teachers and other staff (including volunteers) accept any gifts or hospitality from students and/or their parents/guardians, unless of only nominal value. All offers of gifts or hospitality from students and/or their parents/guardians must be reported in writing to the Head Teacher/Lead Teacher.

2.4. Declarations of interest should be detailed in writing and directed to both the Headteacher and Director of Finance.

2.4.1. To be effective, the declaration of interests needs to be updated at least annually and also when any changes occur. If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the



side of caution. If you would like to discuss any related issue, please contact the Director Finance for confidential guidance.

2.5. Interests will be recorded on Hartmore Education Ltd.'s register of interests, which is maintained by the Director of Finance. This register is displayed on the website.

3. Data Protection

3.1. The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that Hartmore School directors, managers, teachers and other staff act in the best interests of Hartmore Education Ltd. Information provided will not be used for any other purpose.

4. Conflict of Interests

4.1. Hartmore School directors, managers, teachers and other staff are expected to declare all and any potential conflict of interests at the earliest opportunity.

4.2. Where any potential conflict of interests may arise in relation to contracts, negotiations, pricing or other factor, where the person is directly related or has interest in the other party, Hartmore School directors, managers, teachers and other staff are expected to recuse themselves from discussions, negotiations etc., unless directed by the CEO otherwise.

4.2.1. This does not include where the benefits are universal, or where the benefit is insignificant. Nevertheless, all interests are expected to be declared formally and in advance (wherever possible) any interest the Finance Director Headteacher and/or CEO. All decisions regarding what qualifies as a significant interest is that of the Finance Director Headteacher and CEO. These decisions are final and not subject to appeal.

4.2.2. Where required the Finance Director, Headteacher and/or CEO will convene a formal meeting. This meeting will decide;

- The nature and extent of the conflict;
- The actions taken to manage the conflict.

4.2.3. A de minimis exemption will apply to contracts less than £500 in value. Random checks against the register of interest will be made on the award of contracts below this value. If the cumulative value of a series of small contracts with same member/trustee exceeds £1,000 the policy will be used for all individual contracts for that employee. The de minimis exemption does not apply to contracts of employment with Hartmore Education Ltd.. Independent external

5. Managing Contracts Where There is a Conflict of Interest

5.1. No person may be involved in managing or monitoring a contract where they have a direct interest. Monitoring arrangements for such contracts will include provisions for an independent challenge of bills and invoices, and termination of the contract if the relationship is unsatisfactory.



6. Policy Review

6.1. This Policy was developed in October 2020 and will be reviewed again October 2022.