



Thomas Deacon Education Trust

Policy:	Conflicts of Interest
Owner:	TDET HR
Approving Board:	Finance, Audit and Risk Committee
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Unity of Purpose
Trust | Diversity | Excellence | Transformation

Conflict of Interests Policy

1. Introduction

- 1.1 This Conflict of Interest Policy affirms TDET's commitment to ensuring that all decisions and decision-making processes are, and are seen to be, free from personal bias and do not unfairly favour any individual connected with TDET. It protects both the organisation and individuals from any appearance of impropriety and provides guidance on what to do when conflicts arise.
- 1.2 This policy applies to all employees, trustees, volunteers, contractors, and external committee members of TDET.

2. Definitions

- 2.1 A 'conflict of interest' arises when the best interests of an individual are, or could be, different from the best interests of TDET. This includes actual, potential, or perceived conflicts.
- 2.2 A 'conflict of loyalty' occurs when duties owed to another organisation may conflict with duties owed to TDET.
- 2.3 'Close personal connections' include family members, partners, close friends, or business associates.
- 2.4 Employees and volunteers must not receive any benefit from TDET, either directly or indirectly, unless legally authorised. 'Benefit' includes financial gain or favourable treatment.

3. Examples of Conflicts

- 3.1 Direct financial interest – e.g., salary or payment from TDET.
- 3.2 Awarding contracts to companies in which an individual has an interest.
- 3.3 Sale of property at below market value to an individual.
- 3.4 Indirect financial interest – e.g., benefits to a close relative.

3.5 Employment of a spouse or grant to a dependent child.

4. Policy

- 4.1 All individuals must understand what constitutes a conflict of interest and are responsible for recognising and declaring any conflicts.
- 4.2 TDET must document all conflicts and actions taken to manage them.
- 4.3 Annual declarations of interest are required, with real-time updates for new conflicts.
- 4.4 A standard declaration form and central register will be maintained by the Director of Resources.
- 4.5 Individuals must recuse themselves from discussions and decisions where a conflict exists.
- 4.6 Trustees may authorise continued involvement in limited cases, with written justification and risk assessment.
- 4.7 Declarations will be requested at the start of all formal meetings, including MAT Board, Education Committee, Resources Committee, and Academy Committees.

5. Procedure

5.1 When a conflict is identified, the individual must:

- Declare it immediately.
- Ensure it is recorded in the register and/or meeting minutes.
- Refrain from participating in related discussions or decisions.
- Not be counted in the quorum for related decisions.

5.2 All decisions involving conflicts will be recorded in meeting minutes, including:

- Nature and extent of the conflict
- Summary of discussion
- Actions taken to manage the conflict

5.3 If unsure, individuals should seek confidential guidance from the Chief Executive.

6. Training and Awareness

6.1 All relevant individuals will receive induction training on conflicts of interest.

6.2 Refresher training will be provided annually, including case studies and examples.

7. Ethical Framework

7.1 This policy is guided by the Seven Principles of Public Life (Nolan Principles):

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership