Yesoiday HaTorah Multi Academy Trust

Conflict of Interest Policy

Last reviewed	15 August 2025
Review status	October 2026
Next review	October 2027
Approval	Governing Body

1. Definition

A conflict of interest arises when the best interests of an individual trustee, governor or employee are, or could be, different from the best interests of the Academy or Academy Trust itself. This may affect the individual directly or indirectly through a family member, friend or business partner.

Conflicts may be actual, potential or perceived. They may involve financial interests, employment, recruitment, contracts, procurement, personal relationships, outside roles or access to confidential information. A declaration does not automatically imply wrongdoing; the purpose is to manage risks transparently.

2. Statement of Intent

Yesoiday HaTorah Multi Academy Trust is committed to ensuring its decisions and decision-making processes are, and are seen to be, free from personal bias and do not unfairly favour any individual connected with the Trust.

Trustees, governors and employees must act in the Trust's best interests, exercise independent judgement and avoid using their position or Trust information for private advantage. This policy also applies, as appropriate, to members of committees and others participating in Trust decisions.

3. Policy

It is the policy of Yesoiday HaTorah Multi Academy Trust to:

- Ensure every Trustee, Employee or Governor understands what constitutes a conflict of interest and their responsibility to recognise and declare conflicts.
- Document the conflict and the actions taken to ensure it does not affect the decision making of the organisation.
- Ensure that the Trust is scrutinised by the Responsible Officer at least once annually, with findings reported to the Governing Body.
- Maintain an up-to-date register of business and relevant personal interests; obtain declarations on appointment and at least annually, with updates whenever circumstances change.
- Record decisions on how conflicts are managed, including any restrictions on access to papers, discussions, votes or procurement processes.
- Follow current academy trust requirements for related-party transactions, including any applicable reporting, approval, value-for-money and record-keeping obligations before entering into arrangements.

4. Procedure for declaring and managing conflicts

When a Trustee, Employee or Governor identifies a potential conflict of interest, they must:

- Declare it as soon as they become aware of it.
- Ensure it is entered in the conflict of interest register (ongoing conflicts) and/or minuted in the appropriate board papers (one-off conflicts).
- Not take part in any board discussions relating to the matter.
- Not take part in any decision making related to the matter.
- Not be counted in the quorum for decision making related to the matter.

Declarations should also be invited at the start of relevant meetings, even where an interest already appears in the register. A conflicted person must not seek to influence a decision informally, including before or after a meeting.

In the interests of frank and open discussion, a Trustee, Employee or Governor affected by a conflict of interest must leave the room while related discussion or decision making is taking place, unless there is good reason for them to stay.

Any exception allowing a conflicted person to remain must be lawful under the Trust's governing documents and applicable requirements, be limited to providing factual information where appropriate, and be recorded with reasons. The person must not participate in the decision or count towards its quorum.

The minutes should state:

- The declared conflict.
- That the Trustee, Employee or Governor left the room, or the reason they were asked to stay.
- That the Trustee, Employee or Governor took no part in discussion or decision making on the matter.
- That the meeting was quorate (not counting the affected Trustee, Employee or Governor).
- Any other actions taken to manage the conflict.

Where a conflict arises outside a meeting, the individual should notify the Trust Business Manager promptly so that it can be recorded and referred to the appropriate decision-maker. Any unresolved or significant conflict should be escalated to the Chair of the relevant governing body, or to an unconflicted trustee where the Chair is affected.

5. Recruitment, procurement and related-party arrangements

Where a family, personal or business relationship may affect recruitment, pay, contracts or procurement, the interest must be declared before the individual receives confidential papers or participates in selection, evaluation or approval. The Trust's Recruitment Procedure and Recruitment Staff Relatives Policy continue to apply.

Transactions involving trustees, members, senior staff or other connected persons must be assessed against the Academy Trust Handbook requirements in force at the time. The Trust must observe applicable reporting and prior-approval thresholds and requirements, including any restrictions on payments or benefits, and keep a clear audit trail of value for money and authorisation.

6. Advice, scrutiny and review of payments

If a Trustee, Employee or Governor is unsure what to declare, they should err on the side of caution and discuss the matter with the Trust Business Manager for confidential guidance.

The appointed Governor will review any payments made to individuals or companies where an interest has been declared to ensure that this policy has been upheld.

The Responsible Officer will scrutinise the Trust's conflict-of-interest arrangements at least annually and report findings to the Governing Body. This does not replace the responsibilities of trustees, governors, employees or the Trust's other financial assurance arrangements.

7. Register, confidentiality and publication

The Trust will maintain its Register of Business Interests, recording the nature of interests, relevant dates and changes. The Trust will publish the interests required by applicable academy transparency rules while handling other personal information in accordance with data protection requirements. Declarations and meeting records will be retained in line with the Trust's retention arrangements.

8. Breaches and monitoring

A failure to declare or appropriately manage a conflict should be reported to the Trust Business Manager or an unconflicted senior leader or governor. The Trust will consider corrective action, including reconsideration of decisions, financial controls, disciplinary or governance procedures and referral to relevant authorities where required.

This policy will be reviewed annually and earlier if the Academy Trust Handbook, relevant legislation or Trust arrangements change. Approval remains with the Governing Body under existing Trust arrangements.

Connected Policies

- YHMAT Register of Business Interests
- YHMAT Recruitment Procedure
- YHMAT Recruitment Staff Relatives Policy