GREENSHAW
LEARNING TRUST

Greenshaw Learning Trust

Declaration of Interests Policy

Policy Title	Declaration of Interests Policy	
Category	Trust Policy	
Responsible Officer	CEO	
Approved on	October 2025	
Minor technical or operational updates made		
Review Cycle and next approval date	3 year cycle October 2028	
Monitoring arrangements	This policy will be reviewed every 3 years, or sooner if required by statutory guidance updates. The implementation of this policy will be reviewed annually by the Headteacher.	
This Policy is based on or takes into account the following legislation and guidance	● Companies Act 2006; ● Conflicts of Interest: A Guide for Charity Trustees; ● The Academies Trust Handbook; ● The Articles of Association of the Greenshaw Learning Trust; ● Section 33 of Financial Reporting Standard 102; ● Section 9.15 and appendix 1 of the Charities SORP.	

Declaration of Interest (Register of Interests) Policy

Contents

Terminology

- The Trust means the Greenshaw Learning Trust (GLT).
- School means a school or academy within the Greenshaw Learning Trust.
- Headteacher means the headteacher, executive headteacher or principal of the school/academy.
- CEO means the chief executive officer of the Greenshaw Learning Trust.
- Trust Shared Service means the services, functions and staff of the Trust that are not contained within a school budget and/or are not the responsibility of a school Headteacher. With respect to the Trust Shared Service, references in this Policy to the responsibilities of the Headteacher should be read as the GLT CEO.
- Governance Colleague means Trustee or Community Governance Committee member
- Responsible Officer means the member of the Director Team to which responsibility for the management of the policy, procedure or statement has been delegated by the Board of Trustees
- Policy or Policies should be read as including any procedures, reports, templates, models, statements and schedules etc. as specified in the GLT Policy Schedule. Categories of Policy are defined in 'Scope and Applicability'

For the purpose of this document:

- Members, Trustees, and Committee Members are referred to as Governance colleagues;
- Senior Employee means Chief Executive Officer, Chief Finance Officer, Directors, Associate Directors, Assistant Directors, Headteachers and other Senior Leadership Team Members who have significant influence over financial and operational matters.
- Community Governance Committee (CGC) is a local committee of the Board of Trustees connected to a school
- An interest is any personal or professional connection, relationship, or situation that could reasonably be perceived to influence an individual's judgment or decision-making in their role within the Trust. This includes, but is not limited to, family relationships, friendships, business connections , memberships of other organisations, and financial stakes. Having an interest is a normal and often beneficial aspect of involvement with the Trust, providing diverse perspectives and valuable connections.
- The Academy Trust Handbook and Charity Commission guidance often refer to "business and pecuniary interests," as distinct categories that need to be addressed.

  a. **Pecuniary Interests (Financial Interests):** These relate directly to financial gain or loss for the individual or their connected parties. This would include:

     i. Shares in a Company that contracts with the MAT.
     i. Employment by a Company that supplies goods or services to the MAT.
     ii. Financial Benefits from services provided to the MAT.
     iii. Land ownership where its value could be affected by MAT decisions.
     iv. Receipt of payments, loans or other financial benefits from the MAT or its suppliers/ contractors.

  b. **Business Interests:** These refer to involvement in other organisations, regardless of direct financial gain in relation to the MAT. This would include:

     i. Directorships, partnerships or senior roles in other companies or organisations.
     ii. Trustees or governorships in other educational or charitable organisations.
     iii. Membership of professional bodies or other influential groups.
     iv. Any other business activity that could lead to a conflict of loyalty or perception of bias, even if no direct transaction with the MAT is involved.

Scope & Applicability

- It is the responsibility of the Headteacher of each school, and the GLT CEO for the Trust Shared Service, to ensure that their school/service and its staff follow this Policy and all Policies and Procedures across the Trust.
- If there is any question or doubt about the interpretation or implementation of this Policy, the 'Responsible Officer' or the GLT CEO should be consulted.
- Unless otherwise stated, all Policies apply to all schools within the Trust, all Trust employees (including temporary and agency staff), all pupils, all trustees and committee members (including members of community committees), all volunteers, and all visitors and contractors
- **This is a Trust Policy.** The GLT Board of Trustees has approved a set of Trust-wide policies and procedures. A Trust-wide policy/procedure is a single policy/procedure that must be followed by all schools and services in the Trust.

Introduction and Policy Statement

The Greenshaw Learning Trust thrives on the diverse talents, experiences, and connections of its staff. We recognise that individuals naturally have a range of personal and professional interests, which can often bring valuable insights and strengthen our community links.

This policy provides a framework for transparently identifying, declaring, and managing these interests to ensure that all decisions are made with the utmost impartiality, integrity, and always in the best interests of the Trust. It aims to prevent situations where a personal interest of a Governance Colleague or Senior Employee could lead to a conflict of interest, which might compromise decision-making or create an impression of impropriety.

This policy aims to ensure that:

- All Governance colleagues and Senior Employees clearly understand the distinction between a personal interest and a conflict of interest, and their responsibility to openly declare any situations that could potentially influence their objectivity.
- We proactively identify and manage all declared interests, ensuring that potential conflicts are effectively addressed and do not impede the Trust's decision-making processes or undermine public confidence.
- We foster a culture of openness and trust, where declaring an interest is seen as a positive act of transparency, contributing to robust governance and ethical practice.

What is a Conflict of Interest?

A Conflict of Interest arises when an individual's personal interest, or the interest of someone closely connected to them, competes with or could improperly influence their duties and responsibilities to the Multi-Academy Trust. This can lead to a situation where the individual's impartiality or objectivity in decision-making is compromised, or perceived to be compromised. The aim of this policy is to prevent these interests from escalating into conflicts through proactive declaration and transparent management.

Conflicts of interest usually arise in the following situations:

- There is a potential financial or measurable benefit directly to a Governance Colleague or Senior Employees, or indirectly through a connected person. Examples of benefits are where the governance colleagues or Senior Employees decide to:
  - sell, loan or lease Trust assets to a Governance Colleague or Senior Employee
  - acquire, borrow or lease assets from a Governance Colleague or Senior Employee for the Trust
  - pay a Governance Colleague or Senior Employee for carrying out their Governance Colleague role
  - pay a Governance Colleague or Senior Employee for carrying out a separate paid post within the Trust, even if that Governance Colleague or Senior Employee has recently resigned as a Governance Colleague or Senior Employee

- pay a Governance Colleague or Senior Employee, or a person or company closely connected to a Governance Colleague or Senior Employee, for providing a service to the Trust. This covers anything that would be regarded as a service and includes legal, accountancy or consultancy services through to painting or decorating the trust's premises, or any other maintenance work
    - employ a Governance Colleague's or Senior Employee's spouse or other close relative at the Trust. Whilst this constitutes an interest that requires careful management to ensure fair recruitment and employment practices, it should not inhibit appointment of the very best candidate, irrelevant of any personal connection.
    - make a grant to a Governance Colleague or Senior Employee or a person who is a close relative of a Governance Colleague or Senior Employee
    - allow a Governance Colleague or Senior Employee to influence service provision to their exclusive advantage
- A governance colleague's or Senior Employee's duty to the Trust may compete with a duty or loyalty they owe to another organisation or person. While such connections can enrich the Trust by bringing diverse perspectives and external expertise, they must be openly declared to ensure impartiality. A conflict of loyalty could also arise where the religious, political or personal views could interfere with the ability of the Governance Colleague or Senior Employee to decide the issue only in the best interests of the Trust. For example, a governance colleague's or Senior Employee's loyalty to the Trust could conflict with his or her loyalty to:

    - another organisation, such as their employer
    - another charity or trust of which they are a governance colleague
    - a member of their family
    - another connected person or organisation

The test is always that there is a conflict of interest if the governance colleague's or Senior Employees' other interest could, or could be seen to, interfere with the governance colleague's or Senior Employees' ability to decide the issue only in the best interests of the Trust.

Identifying the Conflict of Interest

- Governance colleagues and Senior Employees are expected to identify any conflicts of interest at an early stage.
- A standard agenda item must be included at the beginning of each Board of Trustee and Committee Meetings to enable the declaration of any actual or potential conflicts of interest.
- If a Governance Colleague or Senior Employee is uncertain whether or not they are conflicted, they should err on the side of openness and declare the issue. Transparent declaration is always welcomed as a proactive step to support good governance.
- If a Governance Colleague or Senior Employee is aware of an undeclared conflict of interest affecting another Governance Colleague or Senior Employee, they should notify the other Governance Colleague or Senior Employee or the Chair.
- If a conflict of interest is identified outside of a meeting, the Governance Colleague or Senior Employee must complete a Conflict of Interest Form and submit it to the relevant Governance Professional to the Board of Trustees or CGC
- On an annual basis, or when a Governance Colleague or Senior Employee joins the Trust, a Conflict of Interest Form must be completed to enable the Register of Interest to be kept up to date.

Dealing with the Conflict of Interest

- Once an interest is declared, Governance colleagues / Senior Employees and the relevant body (Board of Trustees or Local CGC) must consider the nature of the interest to ensure any potential for a conflict of interest is effectively managed or eliminated. The goal is to safeguard impartial decision-making while valuing individuals' contributions.
- Where available, legal or governing document requirements on how a conflict of interest must be handled is to be used. However, in serious cases, it can be decided that removing the conflict of interest itself is the most effective way of preventing it from affecting decision-making.
- Examples of important legal or governing document requirements are:
    - Academies Trust Handbook, Section 5.35 to 5.59 Related party transactions, which deals with goods or services provided by individuals or organisations connected to the Trust

and any applicable “at cost” requirements.
    - The Trust’s Articles of Association which cover Conflicts of Interest.
- Serious conflicts of interest include, but are not limited to, those which:
    - Are so acute and extensive that the Governance Colleague or Senior Employee is unable to make their decisions in the best interest of the Trust or could be seen to be unable to do so.
    - Are present in significant or high-risk decisions of the Governance Colleague or Senior Employee.
    - Meaning that effective decision-making is regularly undermined or cannot be managed in accordance with the required or best practice approach.
    - Are associated with inappropriate Governance Colleague or Senior Employee benefits.
- Where there is a proposed financial transaction between a Governance Colleague or Senior Employee and the Trust, or any transaction of arrangement:
    - The benefit must be authorised in advance by the Audit Committee.
    - If there is no Committee meeting planned within the time frame of authorisation being required, then the Chair of the Audit Committee and one other Audit Trustee can be contacted to authorise the benefit.
    - Where the Chair of the Audit Committee is affected then the Chair of the Trust and one other Audit Committee member must authorise the benefit.
    - Affected Governance Colleagues / Senior Employees are expected to be absent from any part of any meeting where the issue is discussed or decided.
    - The affected individual should not vote or be counted in deciding whether a meeting is quorate.
- Where there is a conflict of loyalty and the affected Governance Colleague or Senior Employee does not stand to gain any benefit and there are no specific governing documents or legal provisions about how the conflict of loyalty should be handled, the affected governance colleagues / Senior Employees should declare the interest. The remainder of the Board of Trustees (or Committee) must then decide what level of participation, if any, is acceptable on the part of the Governance Colleague or Senior Employee with the declared interest. This assessment will balance the need for impartiality with the potential for the individual's expertise to benefit the discussion. The options might include, but are not limited to, deciding whether the conflicted Governance Colleague or Senior Employee:
    - Having registered and fully declared the interest, can otherwise participate in the decision.
    - Can stay in the meetings where the decision is discussed and made, but not participate.
    - Should withdraw from the decision-making process in the way described above.
    - If a conflict of interest is raised outside of a meeting and there is no meeting planned within the time frame of the conflict needing to be reviewed, the Chair of the Trust plus one other Trustee, or CGC Chair, plus one CGC Committee Member, can be contacted to consider the conflict of interest and determine the resolution. If the person affected is the CGC Chair, then the Chair of the Trustees plus one other Trustee must consider the conflict of interest and determine the resolution. Where the Chair of the Trust is affected then a Member and one other Trustee must consider the conflict of interest and determine the resolution. The resolutions must be recorded on the Conflict of Interest Log.
- In deciding which course of action to take regarding a Conflict of Interest, Trustees / Committees:
    - Can allow the Governance Colleague or Senior Employee to participate where the declared interest poses a low risk to the decision-making and is unlikely to significantly affect their approach to an issue, thereby retaining their valuable insights and contributions
    - Should be aware that while the presence of a Governance Colleague or Senior Employee with a declared interest can bring valuable perspective, it is crucial to ensure that such an interest does not inadvertently affect trust, inhibit open discussion, or improperly influence decision-making.
    - Should always protect the Trust’s reputation and be aware of the impression that their actions and decisions may have on those outside the Trust.
    - Should always be able to demonstrate that they have made decisions in the best interest

of the Trust and independently of any competing interest.

- Should require the withdrawal of the affected Governance Colleague or Senior Employee from any decisions where the other interest is relevant to a high risk or controversial decision or could, or be seen to, significantly affect the decision-making.

Recording the Conflict of Interest

- The Trust must keep a Register of Interests for Governance Colleagues and Senior Employees, which must be published on the Trust website. This Register of Interest must be kept up to date through regular review. A standing agenda item at each meeting will facilitate a review.
- The Academy Trust Handbook sections 5.45 to 5.48 covers what must be captured in the Register of Interest and what must be published on the website.
- A Declaration of Interest Log must be kept by The Board of Trustees and each Local CGC, which details all declared **interests**, the discussions held to assess them, and the agreed management strategies or resolutions.
- The Logs will be monitored by the Governance & Compliance Team to ensure that actions forming part of the resolution are appropriate, are following legal requirements and have been implemented correctly.

Confidentiality

- Trustees or Senior Employees cannot use information obtained from the Trust for their own benefit or that of another organisation if it has been obtained in confidence or has special value such as commercial sensitivity.

Monitoring and Enforcement

- The Governance & Compliance Team will undertake continuous monitoring to ensure that any conflicts of interest are identified, reviewed and mitigated as soon as possible.
- As detailed in the GLT Governors Code of Conduct, GLT reserves the right to terminate the membership of the relevant Governance Colleague, if they are found to have knowingly and deliberately failed to declare an interest and have brought the Trust into disrepute.
- If a Senior Employee is found to have knowingly and deliberately failed to declare an interest and brought the Trust into disrepute, this will be managed as a disciplinary matter in line with the GLT HR Policy.

Appendix A - Declarations of Interests Form

The Greenshaw Learning Trust is committed to fostering a culture of integrity, impartiality, and transparency. We recognise that our Governance colleagues and Senior Employees have diverse personal and professional interests, many of which can be valuable to the Trust. To support this commitment and comply with statutory requirements, we maintain a public Register of Interests.

Your declarations of interest help us understand and manage any situations where a personal interest could potentially influence your judgment or affect your ability to act impartially. It's important to remember that having an interest is not inherently negative; rather, it's about ensuring transparency and managing potential perceptions. For example, please declare if you:

- Are a Governance colleague at another school or charity (your experience here can be valuable to the Trust, but requires transparent declaration).
- Work for a company that the school might engage the services of (e.g., a catering or payroll provider, etc. – transparency ensures fair procurement).
- Have a personal relationship with any other Governance colleagues or Senior Employee of the Trust (e.g., spouse, partner, relative, etc. – family connections are common and require clear management).
- Have a partner who supplies services to the school (to ensure robust procurement processes).

If you are not sure an interest counts, err on the side of caution and declare it. We ask that you update us whenever your circumstances change so we can ensure our register of interests is accurate.

Governance Colleagues and Senior Employees are reminded that completion of this form does not remove the requirement upon them to disclose orally any interest at any specific meeting and to leave the meeting for that agenda item.

A summary of the relevant information declared on this form will be published on the Trust website to comply with statutory obligations.

Guidance Notes

Governance Colleagues and Senior Employees have a legal duty to act only in the best interests of the Trust and their school(s). Where a situation arises in which they cannot do this due to a personal interest they have, steps should be taken to identify, prevent and record the conflict. This ensures Governance Colleagues and Senior Employees are acting in the best interests of the school.

Declaring your conflicts of interest is a legal requirement within the School Governance (Roles, Procedures and Allowances) (England) Regulations 2013 and for academies, in the Articles of Association and Academies Trust Handbook. However, making an annual declaration does not remove your requirement to make an oral disclosure of the interest and temporarily leave the meeting, where the interest is relevant to something being discussed.

Pecuniary Interests

Generally, **Governance colleagues** and **Senior Employees** should not participate in discussions where they, or someone closely connected to them, may directly or indirectly gain a financial or measurable benefit. This is to safeguard the Trust's financial integrity. All such **pecuniary interests** must be declared, and their management will be determined by the relevant authority, in line with the Articles of Association and the Academies Trust Handbook

Non-Pecuniary Interests (Conflicts of Loyalty)

Non-Pecuniary Interests (Conflicts of Loyalty): A non-pecuniary interest arises when an individual's loyalty to the Trust could potentially compete with a loyalty to another organisation or person, even if there's no direct financial gain. For example, if a Governance Colleague or Senior Employee has a family member working in the school or Trust, or serves on the board of another charity. These connections, while often enriching the Trust through diverse perspectives, must be declared. While the individual may not benefit personally, transparent declaration allows the Trust to manage any potential perception of impaired judgment, ensuring impartiality.