



Hull Collaborative Academy Trust Conflict of Interest Policy

Produced by	Laura Fillingham, Lead Governance Professional Kevin Matchett, Chief Financial Officer
Approved by	Trustees – Full Board Meeting
Date approved	02 July 2024
Review date	July 2025, or sooner if necessary
Related Trust policies	<ul style="list-style-type: none"> • Anti-fraud and Bribery Policy; • Capital Assets (detailed within the HCAT Financial Regulations Policy) ; • Competitive Tendering Policy • Data Protection Policy; • Declared Conflicts of Interest Register; • Disciplinary Policy; • Gifts & Hospitality Policy; • Financial Regulations Policy; • Governance Code of Conduct; • Investment (detailed within HCAT Financial Regulations Policy); • Reserves (detailed within the HCAT Financial Regulations Policy); • Staff Code of Conduct; • Whistleblowing Policy.
Related national guidance	<ul style="list-style-type: none"> • The Companies Act 2006 (strategic Report and Directors' Report) Regulations 2013; • Data Protection Act 2018; • UK General Data Protection Regulation; • The Charities Act 2011
Availability	Accessible via the Trust's website and SharePoint

HCAT Policy Summary		
Policy Key Information		Other Information
Owned By		Trust Board
Original date		July 2024 (new policy)
Approved By		Trust Board
Review Schedule		Annually
Amended dates		N/A
Minimum Review date		Annually
Linked policies		See section 16.0

Conflicts of Interest Policy July 2024

Hull Collaborative Academy Trust's mission statement is 'Children First'. This is central to the organisation's vision, ethos and culture and informs every decision we make.

1.0 Introduction

This policy sets out the framework for ensuring that the decisions and decision-making processes at Hull Collaborative Academy Trust are, and are seen to be, free from personal bias and do not unfairly favour any individual or company connected with the Trust.

2.0 Purpose

Members, Trust Board Members (Trustees), Governors, Local Tier Board Members and the Trust's staff have an obligation to act in the best interests of the Trust and the academy communities they serve to avoid situations where there may be a potential conflict of interest as also detailed in the HCAT Financial Regulations Policy.

Situations may arise where family interests or loyalties conflict with those of the Trust. Such interests may create problems as they can inhibit free discussions, result in decisions or actions that are not in the interests of the Trust, and risk the Trust's reputation.

The Trust has created this policy to:

- Ensure that Members, Trustees, Governors, Local Tier Board Members and members of staff understand what constitutes a conflict of interest, and that they have a responsibility to identify and declare any conflicts that might arise;
- Record the conflict and the actions taken to ensure that the conflict does not affect the decision-making of the Trust.

Hull Collaborative Academy Trust, its academies and nurseries are referred to as HCAT in this policy.

3.0 Legal Framework

This policy has due regard to all relevant legislation including, but not limited to, the following:

- The Companies Act 2006 (strategic Report and Directors' Report) Regulations 2013;
- Data Protection Act 2018;
- UK General Data Protection Regulation;
- The Charities Act 2011.

This policy has due regard to all relevant guidance, including, but not limited to, the following:

- The Charity Commission (2022) 'Conflicts of Interest: a Guide for Charity Trustees';
- The Charity Commission (2020) 'Managing Conflicts of Interest in a Charity';
- ESFA (2023) 'Academy Trust Handbook'

This policy operates in conjunction with the HCAT Financial Regulations Policy, the following Trust policies/documentation and the Code of Conduct for the Members, Trustees, Governors and Local Tier Board members and also the HCAT Staff Code of Conduct:

- Anti-fraud and Bribery Policy;
- Capital Assets (detailed within the HCAT Financial Regulations Policy) ;
- Competitive Tendering Policy
- Data Protection Policy;
- Declared Conflicts of Interest Register;
- Disciplinary Policy;
- Gifts & Hospitality Policy;
- Investment (detailed within HCAT Financial Regulations Policy);
- Reserves (detailed within the HCAT Financial Regulations Policy);
- Whistleblowing Policy.

The following will be compiled from the submitted declarations:

- Declared Conflicts of Interest Register – this is the full register which details the nature of the interests declared (this has restricted access);
- Register of interest overview – this register is published on the Trust website for Members, Trustees and Executive Leaders and on school websites for Governors, Local Tier Board Members and Executive Headteachers and/or Headteachers;
- Related Party Transactions (RPT) Register – academy trusts must report all related party transactions, regardless of value, in their annual financial statements as set out in the Academies Accounts Direction.

4.0 Definitions

For the purpose of this policy, a person is defined as having a ‘business or pecuniary interest’ if they have a monetary or financially vested interest in a business or service, which could prevent the individual from acting in the Trust’s best interests.

‘Conflicts of interest’ are any situations where an individual’s personal interests or loyalties could, or could be seen to, prevent the individual from making a decision in the best interests of the Trust. The most common types of conflict of interest can be separated into ‘financial conflicts’ and ‘loyalty conflicts’.

‘Financial conflicts’ are when an individual is connected to a person and/or organisation and could receive money or something else of value from the selection of their decision. Individuals’ expenses, e.g. governance expenses, are not included in this definition.

‘Loyalty conflicts’ are unrelated to money or individual benefits; rather, these conflicts are concerned with other reasons relating to an individual’s loyalty or duty to another organisation which would impair their decision-making in consideration to their obligation to prioritise the Trust’s best interest.

A ‘connected person’ broadly relates to an individual’s family, relatives, or business partner. To determine if an individual is considered connected in case-specific issues, the Trust will seek legal advice if necessary.

The term ‘significant shareholder’ refers to any individual or relative of an individual holding more than 20 percent of the share capital or exercising more than 20 percent of the voting power in an organisation.

An 'interested party' is defined as a person who has a close relation to a person with a vested interest, e.g. a spouse.

'At cost' refers to the cost of a good or service (not including contracts of employment) without profit.

5.0 Roles and responsibilities

The Trust Board is responsible for:

- Ensuring that all staff members, including volunteers, act in accordance with this policy;
- Identifying any conflicts of interest that have not been previously declared;
- Making complete declarations on an annual basis, and ensuring they are up to date;
- Ensuring there are measures in place to manage and identify any conflicts of interest;
- Operating and making decisions in the best interests of pupils and HCAT;
- Independently and objectively making decisions about executive pay and benefits, scrutinising each decision so conflicts of interest are avoided;
- Operating and making decisions in line with their charitable objectives, where applicable.

The Chair of Trustees is responsible for:

- Ensuring, in liaison with the Governance Professional, that all Members, Trustees and Local Tier Board Members have declared any conflicts of interest, in accordance with the Declared Conflicts of Interest Register;
- Considering the risks associated with an individual who has declared a conflict of interest participating in any decision-making or voting and seeking advice from the Trust Executive Team or legal professional;
- Setting professional standards of governance and accountability for the Board.

The Governance Professional, as Clerk to the Trust Board, is responsible for:

- Keeping an accurate and up to date record of interests for all Members, Trustees, Governors and Local Tier Board Members which is reviewed annually and can be accessed by relevant people;
- Ensuring declarations of interest is added as a standing agenda item for all governance meetings;
- Keeping accurate meeting minutes.

The Chief Finance Officer, is responsible for:

- Keeping an accurate and up to date record of interests for all staff and volunteers, which is reviewed annually, and can be accessed by relevant people.

The Accounting Officer is responsible for:

- Being the Trust's lead in financial matters, including a personal responsibility to government and to the ESFA's Accounting Officer;
- Completing and signing a statement on regularity, propriety and compliance each year and submitting this to the ESFA with the audited accounts;

- Ensuring the Trust Board is compliant with the Trust's Articles of Association, Funding Agreement, and the ESFA Academy Trust Handbook;
- Notifying the ESFA's Accounting Officer immediately, in writing, if the Board is not compliant.

The CEO and Trust Executive Leadership Team are responsible for:

- Ensuring, in liaison with the Chair of Trustees and Governance Professional, that all Members, Trustees, Governors and Local Tier Board Members have declared any conflicts of interest, in accordance with the Declared Conflicts of Interest Register;
- Ensuring that all identified staff members who are responsible for proposing a course of action or handling HCAT's budget have declared any conflicts of interest;
- Deciding who else (other than those listed below) is considered an 'interested party' or who is in a 'position of influence' and ensuring they declare any conflicts of interest as detailed in the HCAT Financial Regulations Policy.

Identified staff are (this list is not exhaustive):

- Members;
- Trustees;
- Governors/LTB Members;
- Senior Management (as listed in the statutory accounts);
- Deputy CFO;
- Trust Operations Manager;
- Other Head Office Managers;
- Governance Professional;
- Heads and Heads of school;
- Office Managers;
- Senior Site Staff.

Staff and volunteers are responsible for:

- Declaring any conflicts of interest;
- Acting in accordance with this policy at all times;
- Identifying any conflicts of interest that have not been previously declared;
- Following the Trust's Whistleblowing Policy where there are concerns that a conflict of interest has not been declared, and an individual might have subsequently benefitted;
- Ensuring that no individuals in a discussion have a vested interest in the subject.

6.0 Identifying Conflicts of Interest

All staff and volunteers will be able to demonstrate that they do not have a vested interest in any decision-making or budget spending. Staff and volunteers that have a relative whom they know to have a declarable interest will declare this information. All staff and volunteers will remain objective and act within the best interests of HCAT and its pupils.

Members, Trustees, Governors, Local Tier Board Members and staff will declare any conflicts of interest at an early stage and inform the relevant people. Members, Trustees, Governors, Local Tier Board Members and staff will ensure that any conflicts of interest do not prevent them from making a decision that would be in the best interests of HCAT and its pupils.

Members, Trustees, Governors, Local Tier Board Members and the identified members of staff will declare the following interests:

- Holding another public office;
- Being an employee, director, adviser or partner of another business or organisation;
- Pursuing business opportunities;
- Having a beneficial interest in a Trust;
- Having a legal or professional obligation to someone else;
- Having received a gift, hospitality or other benefit from someone/an organisation;
- Being a member of a club, society or association;
- Owning a debt to someone/an organisation;
- Owning or occupying a piece of land;
- Owning shares or some other investment or asset;
- Holding or expressing strong political or personal views that may indicate prejudice or predetermination for or against a person or issue;
- Being a Governor, Associate Member or Trustee at any other educational establishment or charity;
- Being a spouse, partner, relative or close friend of someone who has one of these interests.

If the Members, Trustees, Governors, Local Tier Board Members and staff have a relative whom they know to have relevant interests, this will be declared. If a staff member is involved in a procurement exercise in which they have a conflict of interest, they will declare the interest as soon as known and the Trust Operations Manager will instead manage the exercise, for example: if a sibling of a member of staff bids for a contract.

Only relevant interests will be declared. Any interests that do not directly benefit individuals or their relatives do not need to be declared – for example, being a small shareholder in a large national company rather than a significant shareholder.

All interests and connections that could influence HCAT's reputation with the public will be declared.

7.0 Identifying Conflicts of Loyalty

Conflicts of interest can also arise, even if the individual does not gain any financial benefit, when their decision-making as a Member, Trustee, Governor, Local Tier Board Member or staff member could be influenced by their other interests.

Members, Trustees, Governors, Local Tier Board Members and identified staff will be required to declare any interest that might conflict with their loyalty to:

- Another organisation, such as their employer;
- A member of their family;
- Another connected person or organisation;
- Another governing board or committee of which they are a member;
- The individual that appointed them to the governing board.

HCAT employees undertaking a secondment opportunity outside of HCAT (either on a full-time or part-time basis) must have prior, written approval from the CEO. Employees on secondment must

be aware of the possibility of conflicts of interest between their responsibilities as an employee of HCAT and their role as a secondee. All conflicts of interest must be formally declared.

Members, Trustees, Governors, Local Tier Board Members and identified staff will also be required to declare any conflicts of interest where their religious, political or personal views could interfere with their ability to make decisions in the best interests of HCAT.

8.0 The Register of Interests

Each declaration of interest will be recorded on the Trust's Declared Conflicts of Interest Register. This register will allow all Members, Trustees, Governors, Local Tier Board Members and relevant employees to identify any business, commercial, financial or personal interests they have.

The Trust Board will be responsible for keeping their register of interest up to date through regular review.

Details of each interest will be recorded on the register, including the following:

- The nature of the business and/or interest;
- The name of the business and/or interest;
- The date the interest began;
- A brief description of duties or responsibilities;
- The date of cessation of interest;
- The date of entry onto the register;
- Relevant material interests which occur through close family relationships between those individuals and employees.

Any conflicting interests or relationships will be described in sufficient detail using appropriate language to clarify under what circumstances an individual's position might be brought into question. Members, Trustees, Governors, Local Tier Board Members and staff will consider any other interests they deem relevant and, if there is any doubt, register them regardless. If a new interest becomes applicable during the school year, it will be the responsibility of the individual concerned to update their declaration by submitting their declaration of interests; the Declared Conflicts of Interest Register will be updated accordingly. If an individual has no interest to declare, they will indicate this by stating 'nil' on their conflicts of interest form, before signing and dating the declaration. If an individual is unsure whether they have a conflict of interest, the CEO and CFO will advise the individual to declare any possible interests until they can confirm their interests at a later date.

The register of interest overview will be published publicly on the Trust and applicable school's website; however, certain interests of staff members may be omitted from the published copy, unless they are also a Member, Trustee, Governor, Local Tier Board Member or executive member of staff. It is noted that Members must not be Trust employees. The relevant business and pecuniary interests of Members, Trustees, Governors, Local Tier Board Members and the Accounting Officer will be published publicly on the Trust website. HCAT will have discretion over the publication of interests of other individuals named on the register.

The declaration registers will be stored at the Trust Office, where they can be accessed by the CEO and the Chair of Trustees, as well as inspected by Ofsted or anyone else who has a right to it to carry out their statutory duties. The Data Protection Officer (DPO) will ensure that the registers are protected in accordance with the Trust's Data Protection Policy. The Trust Board is responsible for deciding who else has access to the registers.

9.0 Member, Trust Board, Local Governing Body and Local Tier Board benefits

Members, Trustees, Governors and Local Tier Board Members will only be permitted to benefit from HCAT where there is an explicit authority in place in the Trust's governing document. Members, Trustees, Governors and Local Tier Board Members' benefits include any payments or benefits to them, or a connected person, apart from their reasonable out-of-pocket expenses. Benefits also include situations where Members, Trustees and Local Tier Board Members could receive property, loans, goods or services from HCAT.

Where there is a proposed sale or lease of land to a Member, Trustee, Governor and/or and Local Tier Board Member, or to a person or company closely connected with Members, Trustees, Governors and Local Tier Board Members, this will require authorisation from the DfE before it is granted, even if the disposal is at full market value.

The payment of reasonable expenses to a Member, Trustee, Governor and/or and Local Tier Board Member, is not a benefit and therefore does not create a conflict of interest or require authorisation.

10.0 Declaring Interests

Wherever possible, the CEO and Chair of Trustees will make arrangements to avoid a conflict of interest arising. The stipulations below apply to all Members, Trustees, Governors, Local Tier Board Members, the CEO, Executive Leadership Team, Headteachers, Deputies and any others in attendance at meetings, including Senior Leaders.

Members, Trustees, Governors and Local Tier Board Members and staff will be provided with a standard agenda item at the beginning of each meeting, to declare any actual or potential conflicts of interest. Declarations will be made using the required form unless they are made at a meeting where official minutes are being taken. All Members, Trustees, Governors and Local Tier Board Members and staff will be required to declare any interest that has been outlined as an item to be discussed, at the earliest possible opportunity and before any discussion of the item itself. If a Member, Trustee, Governor, Local Tier Board Member or member of staff is unsure whether they are conflicted, they will declare the issue and discuss it with the rest of the Members, Trust Board, Governors or Local Tier Board Members. If a Member, Trustee, Governor, Local Tier Board Member or member of staff is aware of an undeclared conflict of interest affecting another member, they will be required to notify the CEO, CFO and Chair of Trustees for appropriate action.

If the person making the declaration is only one of a number participating in the discussion and decision-making process, the declaration will be made to the other participants. If the person making the declaration is the only person making a decision on behalf of the Trust Board or Local Tier Board, the declaration will be made to the CEO, CFO and Chair of Trustees. If the person making the declaration is the CEO, part of the Executive Leadership Team, or Headteacher the declaration will be made to the CFO and Chair of Trustees.

If new conflicts of interest arise for Members, Trustees, Governors, Local Tier Board Members or staff, they will inform the Chair of Trustees, CEO, CFO and Governance Professional to enable registers to be updated.

11.0 Removing Conflicts of Interest

The Members, Trust Board, Local Governing Body and Local Tier Boards will follow any legal or governing document requirements on how a conflict of interest must be handled, but may, in serious cases, decide that removing a conflict of interest itself is the most effective way of preventing it from affecting their decision-making. The Members, Trust Board, Local Governing Bodies, Local Tier Boards and staff will consider any conflict of interest declared, ensuring that any potential effect on decision-making is eliminated. If an individual has declared an interest, they will be required to leave the room when the matter is being discussed. Staff will declare conflicts of interest to the CEO and CFO and ensure that this information is up to date.

Where there is a conflict of loyalty and the affected Member, Trustee, Governor, Local Tier Board Member or member of staff does not stand to gain any benefit, they will still be required to declare the interest. The rest of the Members, Trustees, Governors and Local Tier Board Members will decide on what level of participation in decision-making, if any, is acceptable on the part of the conflicted member.

The Members, Trust Board, Local Governing Body or Local Tier Board will decide whether the affected member:

- Can participate in the decision, after having registered and fully declared their interest;
- Can stay in the meetings where the decision is discussed and made, but not participate;
- Must be withdrawn from the decision-making process.

When deciding which course of action to take, the Members, Trust Board, Local Governing Body and Local Tier Board will:

- Always make their decisions in the best interests of HCAT and its pupils;
- Always protect HCAT's reputation and be aware of the impression that their actions and decisions may have on others;
- Always be able to demonstrate that they have made decisions in the best interests of HCAT and its pupils, and independently of any competing interest;
- Require the withdrawal of the affected member from any decisions where their other interest is relevant to a high-risk or controversial decision, or could significantly affect the decision-making;
- Allow a member to participate where the existence of their other interest poses a low risk to decision-making in HCAT's interest, or is likely to have only an insignificant bearing on their approach to an issue;
- Be aware that the presence of a conflicted member can affect trust between other Members, Trustees, Governors or Local Tier Board Members, could inhibit free discussion, and might influence decision-making in some way.

If the Members, Trust Board, Governors, Local Tier Board Member or staff member is discussing the appointment of a post, or making decisions that may lead to a staff vacancy, regarding a role for which a Member, Trustee, Governor or Local Tier Board Member could apply, the member in question will be required to leave the discussion, as this is classed a conflict of interest.

Members, Trustees, Governors, Local Tier Board Members and staff who have declared an interest will not be able to vote or make decisions regarding that topic, including any financial activity connected to the matter, and will not be present when the vote is taken. The Governance Professional will record an entry in the minutes when an individual withdraws from a meeting. Declarations will be clearly recorded so that there can be no potential for misunderstandings.

In circumstances where participation is unavoidable, the Chair of Trustees will consider the risks associated with the situation and advice will be sought from the CEO and CFO. An entry of the situation, including the outcome, will be recorded in the minutes.

Serious conflicts of interest include, but are not limited to, those which:

- Are so acute and extensive that the Member, Trustee, Governor, Local Tier Board Member or member of staff is unable to make their decision in the best interests of HCAT and its pupils;
- Are present in significant high-risk decisions;
- Mean that effective decision-making is regularly undermined or cannot be managed in accordance with the required or best practice approach;
- Are associated with an inappropriate Member, Trust Board, Governor, Local Tier Board Member or staff benefit.

To remove a conflict of interest, the Members, Trustees, Governors and Local Tier Board Members will undertake appropriate action, including:

- Not pursuing the course of action;
- Proceeding with the issue in a different way so that a conflict of interest does not arise;
- Securing the resignation of the Member, Trustee, Governor or Local Tier Board Member affected by a conflict of interest;
- Not making appointments that would knowingly introduce a conflict of interest.

12.0 Records of proceedings

Each time a declaration has been made during a meeting or an individual has withdrawn from a discussion, a record will be kept in the meeting minutes. At a minimum, the following information will be recorded:

- The nature of the conflict;
- Which members were affected;
- Whether the conflicts of interest were declared in advance;
- Whether anyone withdrew from the discussion;
- How the Members, Trustees or Local Tier Board Members reached the decision made;
- A description of what was disclosed and in what circumstances;
- A cross-reference to an entry in the register of interest overview;
- The Chair of Trustees or CEO will sign and date the recording.

13.0 Non-compliance

Any Member, Trustee, Governor, Local Tier Board Member or member of staff who fails to reveal information to enable the Members, Trust Board, Local Governing Body or Local Tier Board to fulfil its responsibilities might be in breach of the Governance Code of Conduct and, as such, these incidents will be dealt with on a case-by-case basis accordingly.

The Members, Trust Board, Local Governing Body or Local Tier Board will consider suspending a member if they fail to declare information that brings HCAT's reputation into question.

Any member of staff found to be withholding information about a conflict of interest may be subject to disciplinary action in line with the Trust's Disciplinary Procedures Policy.

Any Member, Trustee, Governor, Local Tier Board Member or staff member or who fails to declare an interest and is found to be in conflict with their decision-making will be required to explain the reasons for their omission.

14.0 Related Party Transactions (RPT)

HCAT must be even-handed in its relationship with related parties by ensuring:

- Trustees comply with their statutory duties to avoid conflicts of interest, not accept benefits from third parties, and declare interest in proposed transactions or arrangements;
- All Members, Trustees, Governors, Local Tier Board Members and specified employees complete the register of interests form;
- A register of interest form has been completed by the Governance Professional as the Clerk to the Trust Board;
- No Member of HCAT uses their connections to HCAT for personal gain;
- All payments are permitted by the Articles of Association or by authority from the Charity Commission;
- The Charity Commission approves payments to a Trustee where there is a significant advantage to HCAT;
- Any payment provided to a person satisfies the 'at cost' requirement.

All related party transactions must be reported to the ESFA in advance of transactions taking place, using the ESFA's [online form](#). The ESFA's prior approval will be obtained, using the online form, for contracts and other agreements for the supply of goods or services to AAT by a related party agreed on or after 1 September 2023 where a contract or other agreement exceeds £40,000 in the same financial year ending 31 August. For the purposes of reporting to the ESFA, transactions with related parties will not include salaries and other payments made by HCAT to a person under a contract of employment through HCAT's payroll.

The following information is needed to create a record for the supplier:

- The name of the supplier;
- The supplier's address;
- The supplier's company number which can be found using the [Companies House website](#) (for limited companies);
- The statement which best describes the relationship between the supplier and HCAT;
- Confirmation that the supplier is listed on HCAT's register of interests;
- Confirmation that HCAT has a statement of assurance from the supplier;
- Confirmation that HCAT has an open-book agreement with the supplier.

The following information is needed about the related party transaction:

- A short description of the goods or services;
- Details of the proposed cost;
- The start and end date of any contract or agreement.

When seeking approval for a related party transaction, evidence including the following is required:

- How HCAT agreed to the related party transaction;
- That HCAT followed the Competitive Tendering Policy;
- That HCAT tested the market before making a decision;
- How HCAT managed any conflicts of interest;
- A copy of the agreement and proposed contract.

The Trust Board and the Accounting Officer will manage personal relationships with related parties to avoid both real and perceived conflicts of interest, promoting integrity and openness in accordance with the seven principles of public life. The Chair of Trustees and the Accounting Officer will ensure their capacity to control and influence does not conflict with requirements.

HCAT recognises that some relationships with related parties may attract greater public scrutiny, such as:

- Transactions with individuals in a position of control and influence, including the Chair of the Board and the Accounting Officer;
- Payments to organisations with a profit motive, as opposed to those in the public or voluntary sectors;
- Relationships with external auditors beyond their duty to deliver a statutory audit.

HCAT must keep sufficient records and make sufficient disclosures in their annual accounts to show accordance with the high standards of accountability and transparency required within the public sector.

HCAT's register of interests will include business and pecuniary interests, including:

- Directorships, partnerships and employments with businesses;
- Trusteeships and governorships at other educational institutions and charities;
- For each interest: the name of the business; the nature of the business; the nature of the interest; and the date the interest began
- Any other interests deemed relevant by the Trust Board.

The register of interests will identify any relevant material interests from close family relationships between the Trust's Members, Trustees, Governors and Local Tier Board Members. It will also identify relevant materials arising from close family relationships between those individuals and employees. Relevant business and pecuniary interests of Members, Trustees, Governors and Local Tier Board Members and the Accounting Officer will be published on the Trust's website.

The Trust will maintain a Related Party Transactions (RTP) Register, which will be stored in accordance with the Trust's Data Protection Policy.

15.0 Monitoring and review

This policy will be reviewed annually or when new legislation or guidance regarding the subject is published and requires the approval of the Trust Board as it cannot be delegated to a committee.

The Trust Board will carry out continuous monitoring of its and Members' activities to ensure that any conflicts of interest are identified and mitigated as soon as possible. The Trust Board will review the Conflicts of Interest Register on a regular basis, or when circumstances have changed. The Conflicts of Interest Register will be available to be viewed and amended at every meeting of the Full Trust Board.

16.0 Other documents

Other documents associated with this policy:

- Anti-fraud and Bribery Policy;
- Capital Assets (detailed within the HCAT Financial Regulations Policy) ;
- Competitive Tendering Policy
- Data Protection Policy;
- Declared Conflicts of Interest Register;
- Disciplinary Policy;
- Gifts & Hospitality Policy;
- Financial Regulations Policy;
- Governance Code of Conduct;
- Investment (detailed within HCAT Financial Regulations Policy);
- Reserves (detailed within the HCAT Financial Regulations Policy);
- Staff Code of Conduct;
- Whistleblowing Policy.