

HALCYON

LONDON INTERNATIONAL SCHOOL

An exceptional education that draws out the unique potential of each student

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Conflicts of Interest Policy

This policy should be considered alongside and in conjunction with Halcyon's Articles of Incorporation, Sections 15 (Declarations of interest), 16 (Conflicts of interest) and 17 (Authorization of conflict of interests).

1. Introduction

Trustees have a legal obligation to act in the best interests of Halcyon London International School ("Halcyon"), and in accordance with Halcyon's governing document, and to avoid situations where there may be a potential conflict of interest.

Conflicts of interest may arise where an individual's personal, family, professional or voluntary interests and/or loyalties conflict with those of Halcyon. Such conflicts may create problems such as:

- A. inhibiting free discussion
- B. decisions or actions that are not in the interests of Halcyon
- C. creating the impression that Halcyon has acted improperly.

The aim of this policy is to protect both the organisation and the individuals involved from any appearance of impropriety.

2. Declaration of interests

All Trustees are required to declare their interests, and any gifts or hospitality offered and received in connection with their role in Halcyon, by completing the Declaration of Interests Form (Appendix A). The Declaration needs to be updated at least annually, and when any material changes occur.

If Trustees are unsure about what to declare, or whether/when a declaration needs to be updated, they should err on the side of caution.

The register of interests shall be used to record all gifts of a value over £50 and hospitality over £50 received by the Trustees.

The register of interest is maintained by the Chair of the Board of Trustees ("the Chair"). The register will be accessible by the Board of Trustees.



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In addition to the register, each Trustee meeting incorporates a standard agenda item at the beginning of each meeting to allow Trustees to declare any actual or potential conflicts of interest.

3. Data protection

All information provided by Trustees will be processed in accordance with data protection legislation as set out in the General Data Protection Regulations 2018 (regulation (EU) 2016/679).

Data will be processed only to ensure that Trustees act in the best interests of Halcyon. The information provided will not be used for any other purpose.

4. Guidance for Trustees who believe they face a conflict of interest

If a Trustee believes s/he has a perceived or real conflict of interest s/he should:

- A. declare the interest at the earliest opportunity
- B. withdraw from discussions and decisions relating to the conflict.

The Chair should take special care to ensure that minutes or other documents relating to the item presenting a conflict are appropriately redacted for the person facing the conflict. A balance needs to be made to ensure that the person still receives sufficient information about the activities of the charity generally without disclosing such sensitive information that could place the individual in an untenable position.

If a Trustee is a user of Halcyon's services, or the carer of someone who uses Halcyon's services, s/he should not be involved in decisions that directly affect the service that they, or the person they care for, receive(s). The Trustee should declare her/his interest at the earliest opportunity and withdraw from any subsequent discussion, unless expressly invited to remain in order to provide information. In this case, s/he may not participate in, or influence, the decision or any vote on the matter. The Trustee will not be counted in the quorum for that part of the meeting and must withdraw from the meeting during any vote on the conflicted item.

There are situations where a Trustee may participate in discussions from which s/he could indirectly benefit, for example where the benefits are universal to all users, or where their benefit is minimal. This action will be agreed by the Chair and minuted accordingly. With



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reference to Trustees who have children who attend the school, the same considerations apply and specifically the following:

- C. The Director and the Chair will inform the parent that they should not be making decisions with regard to their own child(ren) and must make sure that the parent/student is treated the same as all other parents/students according to all school policies.
- D. The parent Trustee may be involved in decisions regarding a group of students that include their child(ren) as long as they are made objectively, are in the best interests of Halcyon, and without special consideration for the child's or family's particular circumstances, interests and characteristics. (If they are, it is the Director's responsibility to inform the Chair who will take action with regard to the Trustee).

If a Trustee fails to declare an interest that is known to the Chair, the Chair will declare that interest.

5. Decisions taken where a Trustee has an interest

In the event of the Board having to decide upon a question in which a Trustee has an interest, all decisions will be made by vote, with a simple majority required. A quorum must be present for the discussion and decision; interested parties will not be counted when deciding whether the meeting is quorate. Interested Board members may not vote on matters affecting their own interests. All decisions under a conflict of interest will be recorded by the Chair and reported in the minutes of the meeting.

The report will record:

- A. the nature and extent of the conflict
- B. an outline of the discussion
- C. the actions taken to manage the conflict.

Where a Trustee benefits from the decision, this will be reported in the annual report and accounts in accordance with the current Charities SORP. All payments or benefits in kind to Trustees will be reported in the charity's accounts and annual report, with amounts for each Trustee listed for the year in question.

Where a member of Halcyon's staff are connected to a party involved in the supply of a service or product to the charity, this information will be fully disclosed in the annual report and accounts.

Independent external moderation will be used where conflicts cannot be resolved through the usual procedures.



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6. Managing contracts

If a Trustee or member of staff has a conflict of interest, s/he must not be involved in managing or monitoring a contract in which s/he has an 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.

Approved by Board of Trustees, July 2019

This policy will be reviewed in accordance with the curriculum review cycle, or more regularly in light of any significant changes in statutory requirements and legislation.



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Appendix A: Declaration of Interests Form 2018/2019

Ias Trustee of Halcyon London International School have set out below my interests in accordance with the organisation's conflicts of interest policy.

Category	Please give details of the interest and whether it applies to yourself or, where appropriate, a member of your immediate family, connected persons or some other close personal connection
Current employment and any previous employment in which you continue to have a financial interest.	
Appointments (voluntary or otherwise) eg: trusteeships, directorships, local authority membership, tribunals, etc.	
Membership of any professional bodies, special interest groups or mutual support organisations.	
Investments in unlisted companies, partnerships and other forms of business, major shareholdings and beneficial interests.	
Gifts or hospitality offered to you by external bodies and whether this was declined or accepted in the last 12 months.	
Do you use, or care for a user, of the organisation's services?	
Any contractual relationship with the charity or its subsidiary.	
Any other conflicts that are not covered by the above.	



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To the best of my knowledge, the above information is complete and correct. I undertake to update as necessary the information provided, and to review the accuracy of the information on an annual basis. I give my consent for it to be used for the purposes described in the conflicts of interest policy and for no other purpose.

Signed:

Position: Trustee

Date:

