



GREEN VALLEY ACADEMY

Conflicts of Interest Policy

Approved: October 2026

DOCUMENT CONTROL

Reference	GVA-10
Policy owner	Chair of the Board of Directors (register); Clerk to the Board (maintenance)
Approved by	Board of Directors — August 2026
Effective from	5 October 2026
Next review	August 2027, and immediately upon any material change
Applies to	All Board members, staff, workers, volunteers, contractors and anyone acting for GVA
Linked documents	Register of Interests; Code of Conduct and Ethical Integrity Policy for Directors; Anti-Bribery and Corruption Policy; Fraud and Audit Assurance Policy; the committee terms of reference in the Governance and Committee Structure

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1. PURPOSE AND SCOPE

- 1.1** This policy ensures that every decision taken at GVA — in the Board of Directors, in every committee, and in every act of management, procurement, admissions and assessment operation — is taken in the interests of GVA and its students, free from improper influence by personal, family, financial or other outside interests, and is seen to be so taken. It applies to members of the Board of Directors and of every committee, to all staff, and to contractors, advisers and recruitment-facing associates; it extends to gifts and hospitality and to transactions with related parties, including entities within The Unibridge Group; and it operates alongside the standalone Conflicts of Interest Policy and Declaration adopted for the Board of Directors, with which it is aligned and which governs directors in the further detail their duties require.

2. DEFINITIONS

- 2.1** An interest means any close personal or family relationship, business interest, financial interest, external role or other outside commitment which relates, or could reasonably appear to relate, to the person's duties at GVA. Interests requiring declaration include, without limitation: paid external work, consultancy and self-employment, particularly in education or recruitment; shareholdings and directorships; trusteeships and public offices; any financial benefit connected with the referral of applicants to GVA; personal or family relationships with applicants, students, colleagues, suppliers or contractors where influence could arise; gifts and hospitality beyond the trivial; and, for staff engaged in academic operation, external roles with the University of Wolverhampton or other institutions, including external examining, which shall be declared even where entirely proper. A conflict exists where an interest could improperly influence, or could reasonably be seen to influence, the person's judgement or duties; the declaration of an interest is not an accusation and implies no wrongdoing — it is the mechanism by which trust is protected.

3. DECLARATION AND THE REGISTER

- 3.1** Every member of the Board of Directors and of every committee, and every member of staff with decision-making, purchasing or student-facing recruitment authority, shall complete a declaration of interests upon appointment, annually each September through the Declaration of Interests Form, and immediately upon any new interest arising, nil returns being required so that silence is never ambiguous. The Clerk to the Board maintains the register of interests, which is reviewed by the Board annually and made available to the external auditor and to any internal review; every meeting of the Board and of each committee opens with a standing declarations item, and any member with an interest in a matter under consideration declares it at the outset whether or not previously registered.

4. MANAGEMENT AND MITIGATIONS

- 4.1** Upon any declaration, the chair of the relevant meeting, or the Principal in management settings, shall decide and minute the mitigation applied, escalating in proportion to the

interest: recording of the declaration where the interest is immaterial; participation in discussion without voting; withdrawal from the item, without receipt of its papers; referral of the matter to a body or officer with no conflicted participant; or, where a conflict is pervasive and unmanageable, standing aside from the role or duty concerned. The mitigation chosen, and the reasons, shall always be minuted — a bare declaration is never treated as sufficient. Transactions with related parties, including any entity within The Unibridge Group, require the prior approval of the non-conflicted members of the Board, evidence that terms are at arm's length and market-tested, and disclosure in the annual accounts; and gifts or hospitality above twenty-five pounds shall be declined or, where refusal would cause offence, declared and recorded in the gifts register, gifts from applicants, students or suppliers during procurement being always declined.

5. BREACHES, OVERSIGHT AND REVIEW

- 5.1** Failure to declare a relevant interest, or participation in a decision in breach of a mitigation, is a serious disciplinary matter for staff and, for Board and committee members, grounds for removal; where concealment procures a financial advantage, the Fraud and Audit Assurance Policy applies. The Audit and Risk Committee reviews the operation of this policy annually, including a sample check of declarations against procurement and admissions activity; and this policy is reviewed annually by the Board of Directors.