

St Alban's Catholic High School



Pecuniary Interest Policy (Academies) Policy

Approved by Full Governing Body on: 18th March 2019

Recommission date: March 2020

Code of Conduct for Academy Board Members & Staff

Register of Disclosure of Interests - Notes of Guidance

The public is entitled to expect the highest standards of conduct from all employees who work for the Academy. Under the Academy's Code of Conduct, all staff, including temporary employees, are required to disclose to the Headteacher the interests set out below. This must be done within 28 days of the interest becoming apparent.

The Academy's register of interest **must** capture relevant business and pecuniary interests of members, trustees and senior employees, including:

- Directorships, partnerships and employments with businesses that provide goods or services to the trust;
- Trusteeships and governorships including at other educational institutions and charities irrespective of whether there is a trading relationship with the trust;
- For each interest: the name of the business, the nature of the business, the nature of the interest, and the date the interest began.

Trusts **must** publish on their websites relevant business and pecuniary interests of trustees and members.

1. Register of Relationships with Contractors and Suppliers of Goods and Services

(a) Award of orders and contracts

Employees who are responsible for the award of orders and contracts should make known, in writing, to their Headteacher all relationships of a business or private nature that they have with contractors and other suppliers of goods and services. An explanation as to the exact nature of the relationship should be made and whether or not the company or business has in the past or currently supplies goods or services to the Academy or has a contract with the Academy.

(b) Relationships in a private or domestic capacity

Employees who, in the course of their job, engage or supervise contractors or have any other official relationship with contractors and/or have had, or currently have, a relationship in a private or domestic capacity with contractors (or their senior staff) should make this known to their Headteacher.

2. Personal Interests

Conflict of interests

Employees must declare in writing to their Headteacher any financial or non-financial interests which could reasonably be considered to conflict with the Academy's interests.

Academies should ensure:

- (a) that employees and governors (including temporary employees) are regularly advised of the need to make such declarations,

- (b) that employees either personally print, complete and sign their name on **the** declaration form or declare any interests including nil returns by email from their own school email address,
- (c) that Pecuniary Interests are updated annually,
- (d) that the Full Governing Body is advised annually that the register is up to date and the name of the person responsible for the register and where they can be located.

Ongoing disclosures need to be submitted in every return, even if they have been previously disclosed. The Register is a living document and the previous returns form part of the Register. The returns should be kept for seven years.

The 'keeper' of the register should ensure that they obtain either a nil return, or a pro-forma which provides the details of the individual declarations.

The Register is accessible for viewing by the following appropriate officers during office hours: Headteacher, Finance Director, External Auditors; and Responsible Officer.

Any request by a member of the public to view the Register of Officers' Interests will be referred to the Headteacher. In considering any request, he will balance the requirement for the Academy to be open and transparent against the requirements of the Data Protection Act 2018 and of Article 8 of the Human Rights Act, and reach a judgement in each specific case.

Examples of situations where it might be necessary for an officer to declare an interest:

There is a legal requirement for the Academy to maintain a Register of Officers' Interests. In declaring any interests you have, you are protecting yourself from any false accusation of bias or corruption.

*In considering whether you have an interest, you should ask yourself whether a member of public, knowing the facts of the situation, could reasonably think that a relationship or interest you have, might conflict with the interests of the Academy. The list below is not exhaustive and **it is also important to note that you may not always need to declare an interest.** For example, the answer to one of the questions below may be "yes", but the relationship or connection does not impinge on the type of work you do, so you may not need to declare an interest. Conversely, there may be other circumstances not listed below where you do need to declare an interest. If in doubt, please speak to your line manager in the first instance.*

Think about the following questions:

- Are you related to a county or district councillor?
- Are you a member of a parish, town or community council? Are you related to a member?
- Are you a school/academy governor or related to a school/academy governor?
- Are you a partner, company secretary or non-executive chairman of a company which does business with the Academy?
- Are you employed by a body which carries out work for the Academy, or were you recently so employed, or are you related to someone who is so employed?

- Do you do part-time or occasional work for a company which undertakes work for the Academy or which competes with the Academy for work?
- Are you undertaking any business ventures in your own time that could conflict with the Academy's interests?
- Are you related to or friends with anyone who tenders for work from the Academy?

Signed by D Verney, Chair of Governors:

Date:
