



REGISTER OF BUSINESS INTERESTS POLICY

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1. Policy Statement

- 1.1 This Policy is subject to the published Equality Information, in line with the Equality Duty 2011 and is underpinned by the Christian beliefs and values of our Academy Trust.

2. Background

- 2.1 It is important that Peterborough Diocese Education Trust and its academies not only act impartially, but are also seen to act impartially.
- 2.2 We all have a responsibility to avoid any conflict between our business and personal interests and affairs and those of the Trust and / or the academy where we work.
- 2.3 There is a legal duty on all of us to declare an interest likely to lead to questions of bias when considering any item of business at a meeting and for us withdraw, if necessary, whilst the matter is considered. In declaring any interests we have, we are protecting ourselves from any false accusation of bias or corruption.
- 2.4 In line with the mandatory guidance in the EFA Academy Finance Handbook, it is the Trust's policy to establish and maintain a register of pecuniary interests for all members, directors, governors, staff in the core Trust (including committee clerks) and senior staff in each academy (defined for these purposes as the Headteacher and any other member of staff with authorisation to raise and / or approve a purchase order and/or contract) indicating any business interests. (NB members of an academy trust are the subscribers to its memorandum of association, and any other individuals permitted under its articles of association).
- 2.5 To avoid repetition within this document, the phrase 'Relevant Individuals' is used to include all members, directors, governors, staff in the core Trust (including committee clerks) and senior staff in each academy (defined for these purposes as the Headteacher and any other member of staff with authorisation to raise and/or approve a purchase order and /or contract).
- 2.6 The register will enable Relevant Individuals to demonstrate that in spending public money they do not benefit personally from the decisions that they make.
- 2.7 The maintenance of the register does not remove the requirement upon any individual to disclose orally any interest at any specific meeting and, if appropriate, to leave the meeting for that agenda item.
- 2.8 Pecuniary interest includes, if appropriate, the company by whom they are employed, directorships, significant shareholdings or other appointments of influence within a business or other organisation which may have dealings with the Trust or its academies. They should include their own interest and those of any member of their immediate family (including partners) or other individuals

known to them who may exert influence. For these purposes the following persons are connected:

- A relative of the Relevant Individual. A relative is defined as a close member of the family, or member of the same household, who may be expected to influence, or be influenced by, the person. This includes, but may not be limited to, a child, parent, spouse or civil partner
- An individual or organisation carrying on business in partnership with the Relevant Individual or a relative of the Relevant Individual
- A company in which a Relevant Individual or the relative of a Relevant Individual (taken separately or together), holds more than 20% of the share capital or is entitled to exercise more than 20% of the voting power at any general meeting of that company
- An organisation which is controlled by a Relevant Individual or the relative of a Relevant Individual (acting separately or together). For these purposes an organisation is controlled by an individual or organisation if that individual or organisation is able to secure that the affairs of the body are conducted in accordance with the individual's or organisation's wishes

3. Maintaining the Register

- 3.1 The format of the register is set out in Appendix A to this policy. Separate pages will be maintained for each Relevant Individual (including multiple sheets for individuals where necessary) and signed by them to confirm the accuracy of the information.
- 3.2 The register will be held in the Trust's Business Director's office, committee clerks and academy Business Managers will take lead responsibility for ensuring all Relevant Individuals are identified and the interests registered.
- 3.3 It is the individual's responsibility to notify the Business Director of any relevant changes in their circumstances. Additionally all individuals will be required to confirm the accuracy of the register entry annually.

APPENDIX A

FORM - REGISTER OF BUSINESS INTERESTS

Name _____

Role _____

Date of Appointment _____

Date of Resignation/Retirement _____

| Name of Organisation | Nature of Interest | Date from which involved | Signature | Date of signature | Date interest ceased | Signature | Date of signature | Notes |
|----------------------|--------------------|--------------------------|-----------|-------------------|----------------------|-----------|-------------------|-------|
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NOTES: 1. Use the notes column to indicate relationships. 2. One page for each Relevant Individual or more if required.
3. Make all entries in ink.

Record of Reviews

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|----------|--|--|--|--|--|--|--|--|--|--|--|
| Date | | | | | | | | | | | |
| Initials | | | | | | | | | | | |

Relevant Individuals 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.

APPENDIX B

FOR GUIDANCE, A SUMMARY OF THE RELEVANT PART OF THE REGULATIONS ABOUT WITHDRAWAL FROM MEETINGS AND DISCLOSURE OF INTEREST ARE SET OUT BELOW.

WITHDRAWAL FROM MEETINGS - HAVING AN INTEREST

The general principle is that no-one should be involved in a decision where his or her personal interests may conflict with those of the Trust or Academy.

- The regulations apply to all Relevant Individuals.
- The clerk to the governing body shall be required to withdraw when the governing body is discussing the clerk's pay/contract or disciplinary action against the clerk.
- Members, Directors and Governors have to withdraw when their own appointment, reappointment or removal as a member of the body or a committee is under consideration.
- Any person who is employed to work at the academy (other than the Headteacher), must withdraw from a meeting where the pay or performance appraisal of any particular person employed to work at the academy is under discussion.
- The Headteacher must withdraw from any meeting where his / her own pay or performance appraisal is under discussion.
- If a person has any pecuniary interest, direct or indirect in any contract, proposed contract or any other matter under discussion at a meeting she / he shall at the meeting disclose the fact and:
 - a) withdraw from a meeting during the consideration or discussion of the meeting;
 - b) not vote on any question with respect to that matter.
- A person has an indirect pecuniary interest if:
 - a) She / he, or any nominee of hers / his, is a member of a company or other body with which a contract is under consideration or has been made;
 - b) She / he is a partner in business or in the employment, of a person with whom the contract is made or under consideration.
- A person has a direct or indirect pecuniary interest in a matter if a relative (including a spouse) living with her/him, has a direct or indirect pecuniary interest.
- The Headteacher (whether a Member, Director, governor or not), a Member, Directors, Governor who is a teacher or member of the non-teaching staff, or any teacher who is in attendance in an advisory capacity should not have an interest that is greater than the interest of the generality of teachers at the academy.
- A person present at a meeting of a selection panel at which the subject for consideration is that person's appointment (or that of his / her relative or spouse) to a post as a teacher or otherwise at the academy, a transfer or promotion or retirement or shall be a candidate for the resulting vacancy, she / he shall be deemed to have an interest.