



# Holbrook Academy

## Pecuniary Interest Policy

<b>Date Approved</b>	24 <sup>th</sup> May 2022
<b>Signed</b>	Helen Butler – Chair of F&P Committee
<b>Minuted</b>	24 <sup>th</sup> May 2022
<b>Date of Next Review</b>	Summer term 2024

## **Code of Conduct for Academy Board Members & Staff**

### **Register of Disclosure of Interests - Notes of Guidance**

#### **1. Introduction**

The public is entitled to expect the highest standards of conduct from all employees and Governors and Members of Holbrook Academy. They are required to disclose to the Headteacher, as Accounting Officer, the interests set out below within 28 days of the interest becoming apparent. The Governing Body are aware of the need to demonstrate leadership by being even handed, to make decisions in the public interest, and to submit to accountability through openness and transparency.

The Governing Body will make decisions in accordance with the 7 principles of public life:

- Selflessness
- Integrity
- Objectivity
- Accountability
- Openness
- Honesty
- Leadership

They recognise the higher standard of accountability resting with them and avoid real and perceived conflicts of interests in any connected party relationships.

No member, governor, employee or related individual or organisation may use their connection to the Academy for personal gain, including payment under terms that are preferential to those that would be offered to an individual or organisation with no connection to the school. The Governing Body complies with the procedures and rules as detailed in the Academies Financial Handbook revised and published annually by the ESFA

#### **2. Register of Disclosure of Pecuniary Interests**

##### **2.1 Relationships with Contractors and Suppliers of Goods and Services**

2.1.1 Award of orders and contracts and the supply of goods and services:- Employees, Governors and Members should make known, in writing, to the 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 or has a contract with the Academy.

2.1.2 Relationships in a private or domestic capacity:- Employees, Governors and Members who 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 the Headteacher.

## 2.2 Personal Interests

Conflict of interests:- Employees, Governors and members must declare in writing to the Headteacher any financial or non-financial interests which could reasonably be considered to conflict with the Academy's interests.

## 3. Procedures

3.1 The Headteacher, as Accounting Officer, is responsible for ensuring:-

- (a) that Governors, Members and Employees (including temporary employees) are regularly advised of the need to make such declarations,
- (b) that Governors, Members and Employees complete the Declaration of Pecuniary Interest form at the start of each school year and personally print and sign their name on the declaration,
- (c) that an opportunity to declare pecuniary interests is a standard agenda item at every committee and Full Governing Body meeting. If an interest is declared this will be recorded and minuted and that person asked to leave the meeting whilst the related item is discussed,
- (d) that the Registers are kept up to date and held by the Company Secretary,
- (e) that the Register is kept up to date and captures relevant business and pecuniary interests of Members, Governors and Employees including:
  - Directorships, partnerships and employments with businesses that, provide or could, provide goods and 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;
  - Other interests and views that may indicate prejudice or predetermination for or against a person or issue,
  - For each interest; the name of the business, the nature of the business, the nature of the interest, and the date the interest began.
- (f) That the Governing Body is advised annually that the Register is up to date.

3.2 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.

- 3.3 The Register is accessible for viewing during office hours by the Headteacher, Finance Manager / Responsible Officer and External Auditors.
- 3.4 The Register of Pecuniary Interests relating to the Members and Governors will be published annually on the Academy website.



## DECLARATION OF PECUNIARY, BUSINESS AND OTHER INTERESTS

Name of Governor/Member: .....

Name of Business	Nature of Business	Nature of Interest	Date of Appointment or Acquisition	Date of Cessation of Interest	Date of Entry

If you and/or your spouse/partner has a link with Holbrook Academy, the Local Authority or any other local school, please provide details below:-

I certify that I have declared all beneficial interests which I or any person closely connected with me have with businesses or other organisations which may have dealings with the academy.

Signed: ..... Date: .....