



Holbrook Academy

Pecuniary Interest Policy

Date Approved	Finance and Personnel Committee 3.07.2013
	Governing Body 10.07.1013
Signed	Jane Gould Chair of Governors)
Minuted	
Date of Next Review	Summer term 2014

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 Principal the interests set out below. This must be done within 28 days of the interest becoming apparent.

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

Award of orders and contracts

Employees who are responsible for the award of orders and contracts should make known, in writing, to the Principal 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 supplied or currently supplies goods or services to the Academy or has a contract with the Academy.

2. Personal Interests

Conflict of interests

Employees must declare in writing 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 personally print and sign their name on the declaration,
- (c) that employees give their declaration of interest form to the Director of Finance and Resources for authorisation,
- (d) that the Director of Finance and Resources personally signs the declaration forms and prints their name,
- (e) that the Registers are kept up to date and held by the Director of Finance and Resources
- (f) that the Full Governing Body is advised annually at the first meeting of the academy year
 - (i) that the register is up to date;

- (ii) the name of the Director of Finance and Resources responsible for the register; and
- (iii) where the register is kept.

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 form which provides the details of the individual declarations.

The Register is accessible for viewing by the following appropriate officers during office hours: Principal, Director of Finance and Resources, 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 Director of Finance and Resources . In considering any request, the Director of Finance and Resources will balance the requirement for the Academy to be open and transparent against the requirements of the Data Protection Act 1998 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 a member of staff to declare an interest:

There is a legal requirement for the Academy to maintain a Register of Staff Members' 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 or someone who works for the Department for education or the Education Funding Agency?
- 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?

3. Governors' meetings

All attendees at governor meetings, including committees, whether as a governor or staff member will have the opportunity to declare their interest at the start of each meeting. During the meeting, the attendee should also declare their interest if they have not already declared it at the start, e.g. if an agenda item discussion covers an area that could potentially be influenced by their business or pecuniary interest but was not apparent from the agenda issued.

Should the interest become relevant, the individual must:

- declare the nature of the interest
- remove himself or herself from the meeting for that agenda item
- submit an updated declaration of interest form (if not already recorded in the annual register)

If another attendee is aware of the interest and the individual concerned has not declared it, the attendee may ask the Chair for the individual to be removed for that agenda item. The Chair should subsequently check with the Director of Finance & Resources whether the attendee has an up to date declaration form and be satisfied that previous discussions and decisions made have not been unduly influenced. For transparency, this check should be recorded in the minutes of the meeting.

Failure to declare relevant interests will be considered a serious breach of this policy and will result in further investigation and where appropriate, disciplinary action.



DECLARATION OF PECUNIARY, BUSINESS AND OTHER INTERESTS

Name of Governor:

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: