

ASHTON WEST END PRIMARY ACADEMY

PECUNIARY INTEREST POLICY



Adopted: July 2019

Revised date: Sept. 2020

This policy must be reviewed annually by the Governing Body meeting. Relevant annual amendments will be completed using the latest version of the Academies Financial Handbook. This policy should be read alongside the Academies Financial Handbook.

Code of Conduct for Academy Board Members & Staff

There will always be an item of each agenda at every Governing Body meeting and Committee meetings confirming the need for declaration of pecuniary interests.

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.

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.

Ashton West End Primary Academy must publish on their websites relevant business and pecuniary interests of trustees and members. Full application of this policy demonstrates that Academy is robust in ensuring that public funds have been used as intended.

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 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 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 Principal.

2. Personal Interests

Conflict of interests

Employees must declare in writing to the Principal any financial or non-financial interests which could reasonably be considered to conflict with the Academy's interests. They must also declare in writing any interests related to close family members i.e. spouses Academies should ensure:

(a) that employees and governors, directors (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 Director 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 pro-forma which provides the details of the individual declarations. The Register is accessible for viewing by the following appropriate officers during office hours: Principal, Finance Officer, 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 Principal. 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 1998 and of Article 8 of the Human Rights Act and reach a judgement in each specific case. 3. Related and Connected Party Transactions (see Appendix 1) Transactions under this category may attract greater scrutiny therefore it is essential that all declarations are fully documented. Related and connected party transactions are required to be "at cost". This means the Academy Trust must pay no more than the "cost" price for goods and services provided by related and connected parties (see Academy Financial Handbook 2018/Section 3.2 for full guidance). All transactions may have to be disclosed in the statement of account as per the law. Section 3 of this policy must be reviewed annually to ensure compliance with the latest Academies Financial Handbook. Related party transaction (appendix 1) will be completed annually by Directors. 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?
- Does a close family member undertake part-time or occasional work for a company which completes 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? Agreed: